

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

409 North Second Street, Suite 500  
Harrisburg, PA 17101-1503  
T 717 237 4800  
F 717 233 0852  
www.buchananingersoll.com

November 16, 2017

**VIA E-FILING**

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

Re: Application of Interactive Energy Group LLC for Approval to Offer, Render, Furnish or Supply Natural Gas Supply Services as a Broker/Marketer to the Public in the Commonwealth of Pennsylvania, Docket No. A-2017-\_\_\_\_\_

Dear Secretary Chiavetta:

Attached for e-filing with the Pennsylvania Public Utility Commission ("Commission") is the signed and verified Application of Interactive Energy Group LLC ("IEG") for Approval to Offer, Render, Furnish or Supply Natural Gas Supply Services as a Broker/Marketer to the Public within the Commonwealth of Pennsylvania. Included with the Application are various Appendices and Attachments in support of the Application, including the following items pursuant to the Commission's requirements:

- The \$350 filing fee is being paid electronically concurrently with this e-filing;
- Application Affidavit and Operations Affidavit (Appendices A and B);
- Proof of Publication (Appendix G);
- Tax Certification Statement (Appendix D);
- Commonwealth Department of State Verification (Attachment 1);
- Certificate of Service showing that the Application and all non-confidential documents are being served upon the parties listed on the Certificate of Service (Appendix C); and
- Letters from Natural Gas Distribution Companies indicating they have determined at this time that IEG does not need to post a bond or other financial security (Attachment 8).

Rosemary Chiavetta, Secretary  
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A hardcopy of IEG's confidential documents will be filed via hand delivery with the Commission separately under seal of confidentiality.

If you have any questions regarding this e-filing, please contact me. Thank you.

Very truly yours,

  
John F. Povilaitis

JFP/gm

Attachments

cc: Certificate of Service

## BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Interactive Energy Group LLC, d/b/a Not Applicable, for approval to offer, render, furnish, or supply natural gas supply services as a(n) [as specified in item #4b below] to the public in the Commonwealth of Pennsylvania (Pennsylvania).

To the Pennsylvania Public Utility Commission:

### 1. IDENTIFICATION AND CONTACT INFORMATION

- a. **IDENTITY OF THE APPLICANT:** Provide name (including any fictitious name or d/b/a), primary address, web address, and telephone number of Applicant:  
Mailing: Interactive Energy Group LLC, 5251 Westheimer Road (Suite 1000), Houston, Texas. 77056  
Business: Interactive Energy Group LLC, 15301 Spectrum Drive Suite 370 Addison, TX 75001  
Support@InteractiveEnergyGroup.com  
InteractiveEnergyGroup.com  
1-800-535-3983 fax: 866-931-7761
- b. **PENNSYLVANIA ADDRESS / REGISTERED AGENT:** If the Applicant maintains a primary address outside of Pennsylvania, provide the name, address, telephone number, and fax number of the Applicant's secondary office within Pennsylvania. If the Applicant does not maintain a physical location within Pennsylvania, provide the name, address, telephone number, and fax number of the Applicant's Registered Agent within Pennsylvania.

Corporation Service Company 2595 Interstate Dr., Suite 103, Harrisburg, PA 17110

- c. **REGULATORY CONTACT:** Provide the name, title, address, telephone number, fax number, and e-mail address of the person to whom questions about this Application should be addressed.

Kristina Montgomery, Regulatory Affairs and Government Relations Manager, 5251 Westheimer Road, #1000, Houston, TX 77056, 905-670-4440, kmontgomery@justenergy.com

- d. **ATTORNEY:** Provide the name, address, telephone number, fax number, and e-mail address of the Applicant's attorney. If the Applicant is not using an attorney, explicitly state so.

John Povilaitis Buchanan Ingersoll & Rooney PC, 409 North Second Street Suite # 500, Harrisburg, PA 17101-1357 Office 717-237-4825, john.povilaitis@bipc.com  
Christianne Robinson Just Energy 5251 Westheimer Road, #1000, Houston, TX 77056 713-933-0629 (ext. 78357) chsanchez@justenergy.com

- e. **CONTACTS FOR CONSUMER SERVICE AND COMPLAINTS:** Provide the name, title, address, telephone number, fax number, and e-mail **OF THE PERSON AND AN ALTERNATE PERSON (2 REQUIRED)** responsible for addressing customer complaints. These persons will ordinarily be the initial point(s) of contact for resolving complaints filed with the Applicant, the Natural Gas Distribution Company, the Pennsylvania Public Utility Commission, or other agencies. The main contact's information will be listed on the Commission website list of licensed NGSs.

Amanda Bailey - Director of Client Services  
6860 Dallas Parkway, Suite 228 Plano, TX 75024  
ABailey@InteractiveEnergyGroup.com

Vanessa Anesetti-Parra – Senior Manager, Compliance and Regulatory Administration  
6345 Dixie Road, Suite 400, Mississauga, ON L5T 2E6,  
Canada Telephone 905-795-3574 FAX 905-670-4585  
PA\_customerfeedback@justenergy.com

## 2. BUSINESS ENTITY FILINGS AND REGISTRATION

a. **FICTITIOUS NAME:** *(Select appropriate statement and provide supporting documentation as listed.)*

The Applicant will be using a fictitious name or doing business as (“d/b/a”)

Provide a copy of the Applicant’s filing with Pennsylvania’s Department of State Pursuant to 54 Pa. C.S. §311.

**Or**

The Applicant will not be using a fictitious name.

b. **BUSINESS ENTITY AND DEPARTMENT OF STATE FILINGS:**

*(Select appropriate statement and provide supporting documentation. As well, understand that Domestic means being formed within Pennsylvania and foreign means being formed outside Pennsylvania.)*

The Applicant is a sole proprietor.

- If the Applicant is located outside the Commonwealth, provide proof of compliance with 15 Pa. C.S. §4124 relating to Department of State filing requirements.

**Or**

The Applicant is a:

- domestic general partnership (\*)
- domestic limited partnership (15 Pa. C.S. §8511)
- foreign general or limited partnership (15 Pa. C.S. §4124)
- domestic limited liability partnership (15 Pa. C.S. §8201)
- foreign limited liability general partnership (15 Pa. C.S. §8211)
- foreign limited liability limited partnership (15 Pa. C.S. §8211)

- Provide proof of compliance with appropriate Department of State filing requirements as indicated above.
- Give name, d/b/a, and address of partners. If any partner is not an individual, identify the business nature of the partner entity and identify its partners or officers.
- Provide the state in which the business is organized/formed and provide a copy of the Applicant’s charter documentation.
- \* If a corporate partner in the Applicant’s domestic partnership is not domiciled in Pennsylvania, attach a copy of the Applicant’s Department of State filing pursuant to 15 Pa. C.S. §4124.

**or**

The Applicant is a:

- domestic corporation (15 Pa. C.S. §1308)
- foreign corporation (15 Pa. C.S. §4124)
- domestic limited liability company (15 Pa. C.S. §8913)
- foreign limited liability company (15 Pa. C.S. §8981)
- Other (Describe):

- Provide proof of compliance with appropriate Department of State filing requirements as indicated above. (see attachment 1)
- Provide the state in which the business is incorporated/organized/formed and provide a copy of the Applicant's charter documentation. (see attachment 2)
- Give name and address of officers. (see attachment 3)

### 3. AFFILIATES AND PREDECESSORS

*(both in state and out of state)*

- a. **AFFILIATES:** Give name and address of any affiliate(s) currently doing business and state whether the affiliate(s) are jurisdictional public utilities. If the Applicant does not have any affiliates doing business, explicitly state so. Also, state whether the applicant has any affiliates that are currently applying to do business in Pennsylvania.

See attachment 4. None of the affiliates are jurisdictional public utilities.

- b. **PREDECESSORS:** Identify the predecessor(s) of the Applicant and provide the name(s) under which the Applicant has operated within the preceding five (5) years, including address, web address, and telephone number, if applicable. If the Applicant does not have any predecessors that have done business, explicitly state so.

Interactive Energy Group LLC was previously known as HE Holdings, LLC d/b/a Hudson Energy Holdings, LLC.  
5251 Westheimer Road, #1000, Houston, TX 77056, hudsonenergy.net, 1-866-587-8674

#### 4. OPERATIONS

a. **APPLICANT'S PRESENT OPERATIONS:** *(select and complete the appropriate statement)*

Definitions

- Supplier – an entity which provides natural gas supply services to retail gas customers utilizing the jurisdictional facilities of a natural gas distribution company
- Broker/Marketer - an entity that acts as an intermediary in the sale and purchase of natural gas but does not take title to the natural gas.

The Applicant is presently doing business in Pennsylvania as a

- natural gas interstate pipeline
- municipality providing service outside its municipal limits
- local gas distribution company
- retail supplier of natural gas services in the Commonwealth
- a natural gas producer
- a broker/marketer engaged in the business of supplying natural gas services
- Other. (Identify the nature of service being rendered)

**or**

The Applicant is not presently doing business in Pennsylvania.

b. **APPLICANT'S PROPOSED OPERATIONS:** The Applicant proposes to operate as a:

- Supplier or Aggregator of natural gas services
- Municipal supplier of natural gas services
- Cooperative supplier of natural gas services
- Broker/Marketer engaged in the business of supplying natural gas services
  - Check here to verify that your organization will not be taking title to the natural gas nor will you be making payments for customers.
- Other (Describe):

c. **PROPOSED SERVICES:** Describe in detail the natural gas supply services which the Applicant proposes to offer.

Interactive Energy Group intends to secure energy supply through retailers on behalf of customers. The customer contract will be directly with the retailers.

d. **PROPOSED SERVICE AREA:** Check the box of each Natural Gas Distribution Company for which the Applicant proposes to provide service.

- |   |  |
|---|--|
| <input type="checkbox"/> Columbia                     | <input type="checkbox"/> Philadelphia Gas Works      |
| <input type="checkbox"/> National Fuel Gas            | <input type="checkbox"/> UGI Central Penn            |
| <input type="checkbox"/> PECO                         | <input type="checkbox"/> UGI Penn natural            |
| <input type="checkbox"/> Peoples Gas – Equitable Div. | <input type="checkbox"/> UGI Utilities               |
| <input type="checkbox"/> Peoples Natural Gas          | <input type="checkbox"/> Valley Energy               |
| <input type="checkbox"/> Peoples TWP                  | <input checked="" type="checkbox"/> All of the above |

e. **CUSTOMERS:** Applicant proposes to provide services to:

- Residential Customers
- Small Commercial Customers - (Less than 6,000 Mcf annually)
- Residential and Small Commercial as Mixed Meter ONLY (CANNOT BE TAKEN WITH RESIDENTIAL AND/OR SMALL COMMERCIAL ABOVE)
- Large Commercial Customers - (6,000 Mcf or more annually)
- Industrial Customers
- Governmental Customers
- All of above (Except Mixed Meter)
- Other (Describe):

f. **START DATE:** Provide the approximate date the Applicant proposes to actively market within the Commonwealth.

Upon Commission approval of the application.

## 5. COMPLIANCE

- a. **CRIMINAL/CIVIL PROCEEDINGS:** State specifically whether the Applicant, an affiliate, a predecessor of either, or a person identified in this Application, has been or is currently the defendant of a criminal or civil proceeding within the last five (5) years.

Identify all such proceedings (active or closed), by name, subject and citation; whether before an administrative body or in a judicial forum. If the Applicant has no proceedings to list, explicitly state such.

See attachment 6.

- b. **SUMMARY:** If applicable; provide a statement as to the resolution or present status of any such proceedings listed above.

See attachment 6

- c. **CUSTOMER/REGULATORY/PROSECUTORY ACTIONS:** Identify all formal or escalated actions or complaints filed with or by a customer, regulatory agency, or prosecutory agency against the Applicant, an affiliate, a predecessor of either, or a person identified in this Application, for the prior five (5) years, including but not limited to customers, Utility Commissions, and Consumer Protection Agencies such as the Offices of Attorney General. If the Applicant has no actions or complaints to list, explicitly state such.

See attachment 6.

- d. **SUMMARY:** If applicable; provide a statement as to the resolution or present status of any actions listed above.

See attachment 6.

## 6. PROOF OF SERVICE

**Required of ALL Applicants regardless of operating as a supplier, broker, marketer, or aggregator.**  
*(Example Certificate of Service is attached at Appendix C)*

- a.) **STATUTORY AGENCIES:** Pursuant to Section 5.14 of the Commission's Regulations, 52 Pa. Code §5.14, provide proof of service of a signed and verified Application with attachments on the following:

Office of Consumer Advocate  
5th Floor, Forum Place  
555 Walnut Street  
Harrisburg, PA 17120

Office of the Attorney General  
Bureau of Consumer Protection  
Strawberry Square, 14th Floor  
Harrisburg, PA 17120

Office of the Small Business Advocate  
Commerce Building, Suite 202  
300 North Second Street  
Harrisburg, PA 17101

Commonwealth of Pennsylvania  
Department of Revenue  
Bureau of Compliance  
Harrisburg, PA 17128-0946

Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2 West  
Harrisburg, PA 17120



b.) **NGDCs:** Pursuant to Sections 1.57 and 1.58 of the Commission's Regulations, 52 Pa. Code §§1.57 and 1.58, provide Proof of Service of the Application and attachments upon each of the Natural Gas Distribution Companies the Applicant proposed to provide service in. Upon review of the Application, further notice may be required pursuant to Section 5.14 of the Commission's Regulations, 52 Pa. Code §5.14. Contact information for each NGDC is as follows.

<p><b>Columbia Gas of PA, Inc.</b>  Michele Caddell  290 W. Nationwide Blvd.  Columbus, OH 43215  PH: 614.460.6841  FAX: 614.460.8447  e-mail: <a href="mailto:mcaddell@nisource.com">mcaddell@nisource.com</a></p>	
<p><b>Peoples Natural Gas – Equitable Division</b>  Lynda Petrichevich  225 North Shore Drive  Pittsburgh, PA 15212  PH: 412.208.6528  FAX: 412.208.6577  e-mail: <a href="mailto:Lynda.w.petrichevich@peoples-gas.com">Lynda.w.petrichevich@peoples-gas.com</a></p>	<p><b>National Fuel Gas Distribution Corp.</b>  David D. Wolford  6363 Main Street  Williamsville, NY 14221  PH: 716.857.7483  FAX: 716.857.7479  e-mail: <a href="mailto:wolfordd@natfuel.com">wolfordd@natfuel.com</a></p>
<p><b>The Peoples Natural Gas Company</b>  Lynda Petrichevich  225 North Shore Drive  Pittsburgh, PA 15212  PH: 412.208.6528  FAX: 412.208.6577  e-mail: <a href="mailto:Lynda.w.petrichevich@peoples-gas.com">Lynda.w.petrichevich@peoples-gas.com</a></p>	<p><b>PECO</b>  Carlos Thillet, Manager, Gas Supply and Transportation  2301 Market Street, S9-2  Philadelphia, PA 19103  PH: 215.841.6452  Email: <a href="mailto:carlos.thillet@exeloncorp.com">carlos.thillet@exeloncorp.com</a></p>
<p><b>Peoples TWP LLC (Formerly T. W. Phillips)</b>  Lynda Petrichevich  225 North Shore Drive  Pittsburgh, PA 15212  PH: 412.208.6528  FAX: 412.208.6577  e-mail: <a href="mailto:Lynda.w.petrichevich@peoples-gas.com">Lynda.w.petrichevich@peoples-gas.com</a></p>	<p><b>Philadelphia Gas Works</b>  Nicholas LaPergola  800 West Montgomery Avenue  Philadelphia, PA 19122  PH: 215.684.6278  email: <a href="mailto:nicholas.lapergola@pgworks.com">nicholas.lapergola@pgworks.com</a></p>
<p><b>UGI Central Penn</b>  David Lahoff  2525 N. 12<sup>th</sup> Street, Suite 360  Reading, PA 19612-2677  PH: 610.796.3520  Email: <a href="mailto:dlahoff@ugi.com">dlahoff@ugi.com</a></p>	<p><b>UGI</b>  David Lahoff  2525 N. 12<sup>th</sup> Street, Suite 360  Reading, PA 19612-2677  PH: 610.796.3520  Email: <a href="mailto:dlahoff@ugi.com">dlahoff@ugi.com</a></p>
<p><b>Valley Energy Inc.</b>  Ed Rogers  523 South Keystone Avenue  Sayre, PA 18840-0340  PH: 570.888-9664  FAX: 570.888.6199  email: <a href="mailto:erogers@ctenterprises.org">erogers@ctenterprises.org</a></p>	<p><b>UGI Penn Natural</b>  David Lahoff  2525 N. 12<sup>th</sup> Street, Suite 360  Reading, PA 19612-2677  PH: 610.796.3520  Email: <a href="mailto:dlahoff@ugi.com">dlahoff@ugi.com</a></p>

## 7. FINANCIAL FITNESS

- a. **BONDING:** In accordance with 66 Pa. C.S. Section 2208(c), no natural gas supplier license shall be issued or remain in force unless the applicant or holder furnishes a bond or other security in a form and amount to ensure the financial responsibility of the natural gas supplier. The criteria used to determine the amount and form of such bond or other security shall be set by each NGDC. Provide documentation that the applicant has met the security requirement of each NGDC by submitting the letters sent by the NGDCs stating what bonding amounts they require.

(see attachment 8)

- b. **FINANCIAL RECORDS, STATEMENTS, AND RATINGS:** Applicant must provide sufficient information to demonstrate financial fitness commensurate with the service proposed to be provided. Examples of such information which may be submitted include the following:

- Actual (or proposed) organizational structure including parent, affiliated or subsidiary companies.
- Published Applicant or parent company financial and credit information (i.e. 10Q or 10K). (SEC/EDGAR web addresses are sufficient)
- Applicant's accounting statements, including balance sheet and income statements for the past two years.
- Evidence of Applicant's credit rating. Applicant may provide a copy of its Dun and Bradstreet Credit Report and Robert Morris and Associates financial form, evidence of Moody's, S&P, or Fitch ratings, and/or other independent financial service reports.
- A description of the types and amounts of insurance carried by Applicant which are specifically intended to provide for or support its financial fitness to perform its obligations as a licensee.
- Audited financial statements exhibiting accounts over a minimum two year period.
- Bank account statement, tax returns from the previous two years, or any other information that demonstrates Applicant's financial fitness.

Note: Just Energy's Annual Report can be found in electronic format on their investor relations website at: <http://justenergygroup.com/FinancialReports/QuarterlyAnnualReports.aspx>

- c. **SUPPLIER FUNDING METHOD:** If Applicant is operating as anything other than **Broker/Marketer only**, explain how Applicant will fund its operations. Provide all credit agreements, lines of credit, etc., and elaborate on how much is available on each item.

Not Applicable. Applicant is operating as a broker/marketer.

- d. **BROKER PAYMENT STRUCTURE:** If applicant is a broker/marketer, explain how your organization will be collecting your fees.

Applicant will collect commission from retailer electric suppliers who enroll customers brought by applicant.

- e. **ACCOUNTING RECORDS CUSTODIAN:** Provide the name, title, address, telephone number, FAX number, and e-mail address of Applicant's custodian for its accounting records.

Michael Miller, Finance Manager, 5251 Westheimer Road Suite 1000, Houston, TX 77056, 713.881.8615 x78615, mmiller@justenergy.com

- f. **TAXATION:** Complete the TAX CERTIFICATION STATEMENT attached as Appendix D to this application.

*All sections of the Tax Certification Statement must be completed. Absence (submitting N/A) of any of the TAX identifications numbers (items 7A through 7C) shall be accompanied by supporting documentation or an explanation validating the absence of such information.*

*Items 7A and 7C on the Tax Certification Statement are designated by the Pennsylvania Department of Revenue. Item 7B on the Tax Certification Statement is designated by the Internal Revenue Service.*

## 8. TECHNICAL FITNESS:

To ensure that the present quality and availability of service provided by natural gas distribution companies does not deteriorate, the Applicant shall provide sufficient information to demonstrate technical fitness commensurate with the service proposed to be provided.

- a. **EXPERIENCE, PLAN, STRUCTURE:** such information may include:  
(see attachment 4)

- Applicant's previous experience in the natural gas industry.
- Summary and proof of licenses as a supplier of natural gas services in other states or jurisdictions.
- Type of customers and number of customers Applicant currently serves in other jurisdictions.
- Staffing structure and numbers as well as employee training commitments.
- Business plans for operations within the Commonwealth.
- Any other information appropriate to ensure the technical capabilities of the Applicant.

- b. **PROPOSED MARKETING METHOD** (*check all that apply*)

- Internal – Applicant will use its own internal resources/employees for marketing
- External NGS – Applicant will contract with a **PUC LICENSED NGS**
- Affiliate – Applicant will use a **NON-NGS affiliate that is a nontraditional marketer and/or marketing services consultant**
- External Third-Party – Applicant will contract with a **NON-NGS third party nontraditional marketer and/or non-selling marketer**
- Other (Describe):

c. **DOOR TO DOOR SALES:** Will the Applicant be implementing door to door sales activities?

- Yes
- No

If yes, will the Applicant be using verification procedures?

- Yes
- No

If yes, describe the Applicant's verification procedures.

d. **OVERSIGHT OF MARKETING:** Explain all methods Applicant will use to ensure all marketing is performed in an ethical manner, for both employees and subcontractors.

We require 2 year's 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 sales person 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).

e. **OFFICERS:** Identify Applicant's chief officers, and include the professional resumes for any officers directly responsible for operations. All resumes should include date ranges and job descriptions containing actual work experience. (see attachment 5)

## 9. **DISCLOSURE STATEMENT:**

*(Not applicable for an applicant applying for a license exclusively as a broker/marketer.)*

**DISCLOSURE STATEMENTS:** If proposing to serve Residential and/or Small Commercial (less than 6,000 Mcf annually) Customers, provide a Residential and/or Small Commercial disclosure statement. A sample disclosure statement is provided as Appendix E to this Application.

- Natural gas should be priced in clearly stated terms to the extent possible. Common definitions should be used. All consumer contracts or sales agreements should be written in plain language with any exclusions, exceptions, add-ons, package offers, limited time offers or other deadlines prominently communicated. Penalties and procedures for ending contracts should be clearly communicated.

## 10. VERIFICATIONS, ACKNOWLEDGEMENTS, AND AGREEMENTS

- a. **STANDARDS OF CONDUCT AND DISCLOSURE:** As a condition of receiving a license, Applicant agrees to conform to any Uniform Standards of Conduct and Disclosure as set forth by the Commission. Further, the Applicant agrees that it must comply with and ensure that its employees, agents, representatives, and independent contractors comply with the standards of conduct and disclosure set out in Commission regulations at 52 Pa. Code § 62.114.

AGREED

- b. **REPORTING REQUIREMENTS:** Applicant agrees to provide the following information to the Commission:

- **Reports of Gross Receipts:** Applicant shall file an annual report with the Commission on an annual basis no later than April 30<sup>th</sup> following the end of the calendar year per 52 Pa. Code § 62.110.

AGREED

- c. **TRANSFER OF LICENSE:** The Applicant understands that if it plans to transfer its license to another entity, it is required to request authority from the Commission for permission prior to transferring the license. See 66 Pa. C.S. § 2208(d). Transferee will be required to file the appropriate licensing application.

AGREED

- d. **ANNUAL FEES:** The Public Utility Code authorizes the PUC to collect an annual fee of \$350 from suppliers, brokers, marketers, and aggregators selling natural gas in the Commonwealth of PA, and a supplemental fee based on annual gross intrastate revenues, applicable to suppliers only.

ACKNOWLEDGED

- e. **FURTHER DEVELOPMENTS:** Applicant is under a continuing obligation to amend its application if substantial changes occur to the information upon which the Commission relied in approving the original filing. See 52 Pa. Code § 62.105.

AGREED

- f. **FALSIFICATION:** The Applicant understands that the making of false statement(s) herein may be grounds for denying the Application or, if later discovered, for revoking any authority granted pursuant to the Application. This Application is subject to 18 Pa. C.S. §§4903 and 4904, relating to perjury and falsification in official matters.

AGREED

**g. NOTIFICATION OF CHANGE:** If your answer to any of these items changes during the pendency of your application or if the information relative to any item herein changes while you are operating within the Commonwealth of Pennsylvania, you are under a duty to so inform the Commission, within thirty (30) days, as to the specifics of any changes which have a significant impact on the conduct of business in Pennsylvania. See 52 Pa. Code § 62.105.

AGREED

**h. CEASING OF OPERATIONS:** Applicant is also required to officially notify the Commission if it plans to cease doing business in Pennsylvania, 90 days prior to ceasing operations.

AGREED

**i. FILING FEE:** The Applicant has enclosed or paid the required, non-refundable filing fee by **CERTIFIED CHECK OR MONEY ORDER** in the amount of \$350.00 payable to the Commonwealth of Pennsylvania. The Commission does not accept corporate or personal checks for filing fees.

PAYMENT ENCLOSED

**11. AFFIDAVITS**  
(All affidavits must be notarized before filing.)

**a.) APPLICATION AFFIDAVIT:** Complete and submit with your filing an officially notarized Application Affidavit stating that all the information submitted in this application is truthful and correct. An example copy of this Affidavit can be found at Appendix A.

**b.) OPERATIONS AFFIDAVIT:** Provide an officially notarized affidavit stating that you will adhere to the Public Utility Code of Pennsylvania and applicable federal and state laws. An example copy of this Affidavit can be found at Appendix B.

## 12. NEWSPAPER PUBLICATIONS

**Required of ALL Applicants regardless of operating as a supplier, broker, marketer, or aggregator.**

Notice of filing of this Application must be published in newspapers of general circulation covering each county in which the applicant intends to provide service. The newspapers in which proof of publication are required is dependent on the service territories the applicant is proposing to serve.

The chart below dictates which newspapers are necessary for each NGDC. For example, an applicant that wants to operate in Peoples – Equitable would need to run ads in both The Erie Times-News and the Pittsburgh Post-Gazette. If the applicant is proposing to serve the entire Commonwealth, please file proof of publication in all seven newspapers.

The only acceptable verification of this requirement is with Notarized Proofs of Publication, which may be requested from each newspaper and must be supplied with this application. Applicants do not need a docket number in their publication. Docket numbers will be issued when all criteria on the item 14 checklist (see below) are satisfied.

	Erie Times-News	Harrisburg Patriot-News	Philadelphia Daily News	Pittsburgh Post-Gazette	Scranton Times-Tribune	Williamsport Sun-Gazette	Johnstown Tribune-Democrat
Columbia Gas	X	X		X		X	X
National Fuel Gas				X			
PECO			X				
Peoples - Equitable	X			X			
Peoples Natural Gas	X			X			X
Peoples TWP LLC				X			
Philadelphia Gas Works			X				
UGI		X	X		X		
UGI Central Penn	X	X	X	X	X	X	X
UGI Penn Natural		X			X	X	
Valley Energy					X	X	
Entire Commonwealth	X	X	X	X	X	X	X

*(Example Publications are provided at Appendices F and G)*

## 13. SIGNATURE

Applicant: Interactive Energy Group LLC

By: 

Title: President

**Approved  
By  
Legal**



**14. CHECKLIST**

For the applicant's convenience, please use the following checklist to ensure all relevant sections are complete. The Commission Secretary's Bureau will not accept an application unless each of the following sections is complete.

**Applicant:** Interactive Energy Group LLC

	<b>Signature</b>	
✓	<b>Filing Fee (ONLY CERTIFIED CHECK OR MONEY ORDER)</b>	
✓	<b>Application Affidavit</b>	
✓	<b>Operations Affidavit</b>	
✓	<b>Proof of Publication</b>	
✓	<b>Tax Certification Statement</b>	
✓	<b>Commonwealth Department of State Verification</b>	
✓	<b>Certificate of Service</b>	

Applicant's Use

PUC Secretary's Bureau Use



Appendix A

APPLICATION AFFIDAVIT

[Commonwealth/State] of Texas :

: ss.

County of Collin :

C. Brent Moore, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

[He/she is the President (Office of Affiant) of Interactive Energy Group LLC (Name of Applicant);]

[That he/she is authorized to and does make this affidavit for said Applicant;]

That the Applicant herein IEG has the burden of producing information and supporting documentation demonstrating its technical and financial fitness to be licensed as a natural gas supplier pursuant to 66 Pa. C.S. § 2208 (c)(1).

That the Applicant herein IEG has answered the questions on the application correctly, truthfully, and completely and provided supporting documentation as required.

That the Applicant herein IEG acknowledges that it is under a duty to update information provided in answer to questions on this application and contained in supporting documents.

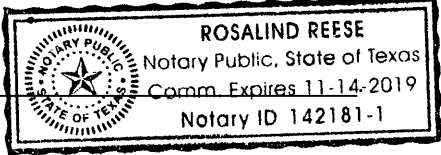
That the Applicant herein IEG acknowledges that it is under a duty to supplement information provided in answer to questions on this application and contained in supporting documents as requested by the Commission.

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

C. Brent Moore  
Signature of Affiant

Sworn and subscribed before me this 2<sup>nd</sup> day of November, 2017.

Rosalind Reese  
Signature of official administering oath

My commission expires \_\_\_\_\_  


Approved  
By  
Legal  
gsk

**Appendix B**

**OPERATIONS AFFIDAVIT**

[Commonwealth/State] of Texas :

: **SS.**

County of Collin :

C. Brent Moore, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

[He/she is the President (Office of Affiant) of Interactive Energy Group LLC (Name of Applicant);]

[That he/she is authorized to and does make this affidavit for said Applicant;]

That Interactive Energy Group LLC, the Applicant herein, acknowledges that [Applicant] may have obligations pursuant to this Application consistent with the Public Utility Code of the Commonwealth of Pennsylvania, Title 66 of the Pennsylvania Consolidated Statutes; or with other applicable statutes or regulations including Emergency Orders which may be issued verbally or in writing during any emergency situations that may unexpectedly develop from time to time in the course of doing business in Pennsylvania.

That Interactive Energy Group LLC, the Applicant herein, asserts that [he/she/it] possesses the requisite technical, managerial, and financial fitness to render natural gas supply service within the Commonwealth of Pennsylvania and that the Applicant will abide by all applicable federal and state laws and regulations and by the decisions of the Pennsylvania Public Utility Commission.

That Interactive Energy Group LLC, the Applicant herein, certifies to the Commission that it is subject to, will pay, and in the past has paid, the full amount of taxes imposed by Articles II and XI of the Act of March 4, 1971 (P.L. 6, No. 2), known as the Tax Reform Act of 1971 and any tax imposed by Chapter 22 of Title 66. The Applicant acknowledges that failure to pay such taxes or otherwise comply with the taxation requirements of Chapter 28 shall be cause for the Commission to revoke the license of the Applicant. The Applicant acknowledges that it shall report to the Commission its jurisdictional natural gas sales for ultimate consumption, for the previous year or as otherwise required by the Commission. The Applicant also acknowledges that it is subject to 66 Pa. C.S. §506 (relating to the inspection of facilities and records).

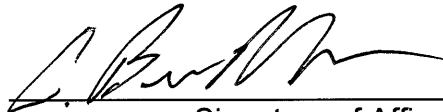
Applicant, by filing of this application waives confidentiality with respect to its state tax information in the possession of the Department of Revenue, regardless of the source of the information, and shall consent to the Department of Revenue providing that information to the Pennsylvania Public Utility Commission.

**Appendix B (Continued)**

That Interactive Energy Group LLC, the Applicant herein, acknowledges that it has a statutory obligation to conform with 66 Pa. C.S. §506 and the standards and billing practices of 52 PA. Code Chapter 56.


That the Applicant agrees to provide all consumer education materials and information in a timely manner as requested by the Office of Communications or other Commission bureaus. Materials and information requested may be analyzed by the Commission to meet obligations under applicable sections of the law.

That the facts above set forth are true and correct/true and correct to the best of his/her knowledge, information, and belief.



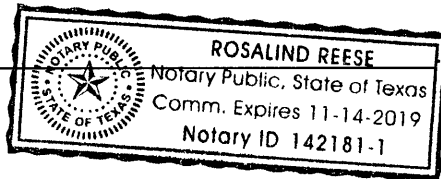
\_\_\_\_\_  
Signature of Affiant

Sworn and subscribed before me this 2<sup>nd</sup> day of November, 2017.



\_\_\_\_\_  
Signature of official administering oath

My commission expires \_\_\_\_\_



Approved  
By  
Legal



Certificate of Service (Appendix C)  
Outside Legal Counsel

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Interactive Energy Group LLC Application :  
For Approval to Offer, Render, Furnish, :  
Or Supply Natural Gas Supply Services :           Docket No. A-2017-\_\_\_\_\_  
As a Broker/Marketer to the Public in :  
The Commonwealth of Pennsylvania :

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true and correct copy of Interactive Energy Group LLC's Natural Gas Supplier Application and all NON-CONFIDENTIAL attachments via First Class Mail in accordance with the requirements of 52 Pa. Code § 1.54 et seq., upon the following:

Office of Consumer Advocate  
5th Floor, Forum Place  
555 Walnut Street  
Harrisburg, PA 17120

Office of the Attorney General  
Bureau of Consumer Protection  
Strawberry Square, 14th Floor  
Harrisburg, PA 17120

Office of Small Business Advocate  
Commerce Building, Suite 1102  
300 North Second Street  
Harrisburg, PA 17101

Commonwealth of Pennsylvania  
Department of Revenue  
Bureau of Compliance  
Harrisburg, PA 17128-0946

Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2 West  
Harrisburg, PA 17120

Columbia Gas of Pennsylvania, Inc.  
Michele Caddell  
290 W. Nationwide Blvd.  
Columbus, OH 43215

Peoples Natural Gas – Equitable Division  
Lynda W. Petrichevich  
225 North Shore Drive  
Pittsburgh, PA 15212

National Fuel Gas Distribution Corp.  
David D. Wolford  
6363 Main Street  
Williamsville, NY 14221

Peoples Natural Gas Company LLC  
Lynda W. Petrichevich  
225 North Shore Drive  
Pittsburgh, PA 15212

PECO Energy Company  
Carlos Thillet, Manager, Gas Supply and  
Transportation  
2301 Market Street, S9-2  
Philadelphia, PA 19103

Peoples Gas Company  
Lynda W. Petrichevich  
225 North Shore Drive  
Pittsburgh, PA 15212

Philadelphia Gas Works  
Nicholas LaPergola  
800 West Montgomery Avenue  
Philadelphia, PA 19122

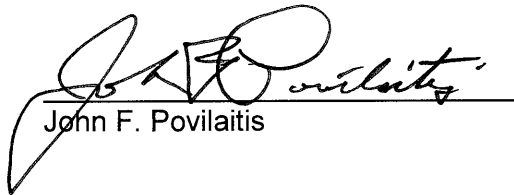
UGI Central Penn Gas, Inc.  
David Lahoff  
2525 N. 12<sup>th</sup> Street, Suite 360  
Reading, PA 19612-2677

UGI Utilities, Inc. – Gas Division  
David Lahoff  
2525 N. 12<sup>th</sup> Street, Suite 360  
Reading, PA 19612-2677

Valley Energy, Inc.  
Ed Rogers  
523 South Keystone Avenue  
Sayre, PA 18840-0340

UGI Penn Natural Gas, Inc.  
David Lahoff  
2525 N. 12<sup>th</sup> Street, Suite 360  
Reading, PA 19612-2677

Date: 11/16/17

  
John F. Povilaitis

## Tax Certification Statement (Appendix D)

Disclosure Statement (Appendix E).  
Not Applicable



Publication Notice for NGS Only (Appendix F)

See Appendix G – Combined EGS and NGS Notice

Proof of Publication  
Combined EGS and NGS Notice (Appendix G)

Notarized Proofs of Publication from the following 7 newspapers  
for proposed service to entire Commonwealth:

Erie Times-News  
Patriot News  
Philadelphia Daily News  
Pittsburgh Post-Gazette  
Scranton Times  
Williamsport Sun-Gazette  
The Tribune-Democrat

PROOF OF PUBLICATION  
In  
THE ERIE TIMES-NEWS  
COMBINATION EDITION

BUCHANAN INGERSOLL & ROONEY PC  
409 N SECOND ST SUITE 500  
HARRISBURG PA 17101-1357

REFERENCE: 102944 283672  
PUC Notice

STATE OF PENNSYLVANIA)  
COUNTY OF ERIE ) SS:

Brenda L. Learn, being duly sworn, deposes and says that: (1) he/she is a designated agent of the Times Publishing Company (TPC) to execute Proofs of Publication on behalf of the TPC; (2) the TPC, whose principal place of business is at 205 W. 12th Street, Erie, Pennsylvania, owns and publishes the Erie Times-News, established October 2, 2000, a daily newspaper of general circulation, and published at Erie, Erie County Pennsylvania; (3) the subject notice or advertisement, was published in the regular edition(s) of said newspaper on the date(s) referred to below. Affiant further deposes that he/she is duly authorized by the TPC, owner and publisher of the Erie Times-News, to verify the foregoing statement under oath, and affiant is not interested in the subject matter of the aforesaid notice or advertisement, and that all allegations in the foregoing statement as to time, place and character of publication are true.

PUBLISHED ON: 09/28/17

TOTAL COST: \$610.00 AD SPACE: 0 Lines

FILED ON: 09/28/17

**PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
NOTICE**

Applications of **Interactive Energy Group LLC** For Approval To Offer, Render, or Furnish Services as a **Marketer/Broker Engaged In The Business Of Supplying Natural Gas Supply Services and Electricity Supply or Electric Generation Services To The Public In The Commonwealth Of Pennsylvania.**

**Interactive Energy Group LLC** will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as a broker/marketer engaged in the business of providing natural gas services. **Interactive Energy Group LLC** will also be filing an application with the PUC for a license to supply electricity or electric generation services as broker/marketer engaged in the business of supplying electricity. **Interactive Energy Group LLC** proposes to sell electricity, natural gas, and related services within the Entire Commonwealth of Pennsylvania under the provisions of the new Natural Gas Choice and Competition Act and the Electricity Generation Customer Choice and Competition Act.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of **Interactive Energy Group LLC** may be filed within 15 days of the date of this notice with the Secretary of the PUC, 400 North Street, Harrisburg, PA 17120. You should send copies of any protest to **Interactive Energy Group LLC** at the address listed below.

Interactive Energy Group LLC  
c/o John F. Povillaitis  
Buchanan Ingersoll & Rooney PC  
409 N. Second Street, Suite 500  
Harrisburg, PA 17101  
717.237.4825

EP283672

Sworn to and subscribed before me this 14th day of October 2017

Affiant: Brenda L. Learn

NOTARY: Barbara J. Moore

COMMONWEALTH OF PENNSYLVANIA  
NOTARIAL SEAL  
Barbara J. Moore, Notary Public  
City of Erie, Erie County  
My Commission Expires March 23, 2020  
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES



# The Patriot News

LEGAL AFFIDAVIT

AD#: 0008364021

Commonwealth of Pennsylvania,) ss  
County of Cumberland)

Crystal Rosensteel being duly sworn, deposes that he/she is principal clerk of PA Media Group; that The Patriot News is a public newspaper published in the city of Mechanicsburg, with general circulation in Cumberland and Dauphin and surrounding counties, and this notice is an accurate and true copy of this notice as printed in said newspaper, was printed and published in the regular edition and issue of said newspaper on the following date(s):

**The Patriot News 09/28/2017**

Principal Clerk of the Publisher

Sworn to and subscribed before me this 29th day of September 2017

*Donna M. Maldonado*  
Notary Public

COMMONWEALTH OF PENNSYLVANIA  
Notarial Seal  
Donna M. Maldonado, Notary Public  
Susquehanna Twp., Dauphin County  
My Commission Expires Nov. 5, 2017  
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

**PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
NOTICE**

Applications of **Interactive Energy Group LLC** For Approval To Offer, Render, or Furnish Services as a **Marketer/Broker** Engaged In The Business Of Supplying Natural Gas Supply Services and Electricity Supply or Electric Generation Services, To The Public In The Commonwealth Of Pennsylvania.

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The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of **Interactive Energy Group LLC** may be filed within 15 days of the date of this notice with the Secretary of the PUC, 400 North Street, Harrisburg, PA 17120. You should send copies of any protest to **Interactive Energy Group LLC** at the address listed below.

Interactive Energy Group LLC  
c/o John F. Povolaitis  
Buchanan Ingersoll & Rooney PC  
409 N. Second Street, Suite 500  
Harrisburg, PA 17101  
717 237 4825

Proof of Publication in The Philadelphia Daily News  
Under Act. No 587, Approved May 16, 1929

STATE OF PENNSYLVANIA  
COUNTY OF PHILADELPHIA

Helene Sweeney being duly sworn, deposes and says that **The Philadelphia Daily News** is a newspaper published daily, except Sunday, at Philadelphia, Pennsylvania, and was established in said city in 1925, since which date said newspaper has been regularly issued in said County, and that a copy of the printed notice of publication is attached hereto exactly as the same was printed and published in the regular editions and issues of the said newspaper on the following dates:

September 27, 2017

Affiant further deposes and says that she is an employee of the publisher of said newspaper and has been authorized to verify the foregoing statement and that she is not interested in the subject matter of the aforesaid notice of publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.

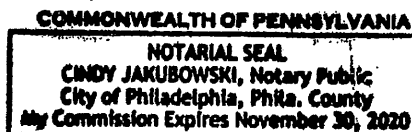


Sworn to and subscribed before me this 27th day of  
September, 2017.



Notary Public

My Commission Expires:



Copy of Notice of Publication

PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
NOTICE

Applications of **Interactive Energy Group LLC** For Approval To Offer, Render, or Furnish Services as a Marketer/Broker Engaged In The Business Of Supplying Natural Gas Supply Services and Electricity Supply or Electric Generation Services, To The Public In The Commonwealth Of Pennsylvania.

**Interactive Energy Group LLC** will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as a broker/marketer engaged in the business of providing natural gas services. **Interactive Energy Group LLC** will also be filing an application with the PUC for a license to supply electricity or electric generation services as broker/marketer engaged in the business of supplying electricity. **Interactive Energy Group LLC** proposes to sell electricity, natural gas, and related services within the Entire Commonwealth of Pennsylvania under the provisions of the new Natural Gas Choice and Competition Act and the Electricity Generation Customer Choice and Competition Act.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of **Interactive Energy Group LLC** may be filed within 15 days of the date of this notice with the Secretary of the PUC, 400 North Street, Harrisburg, PA 17120. You should send copies of any protest to **Interactive Energy Group LLC** at the address listed below.

Interactive Energy Group LLC  
c/o John F. Povolatis  
Buchanan Ingersoll & Rooney PC  
409 N. Second Street, Suite 500  
Harrisburg, PA 17101  
717.237.4826

**Proof of Publication of Notice in Pittsburgh Post-Gazette**

Under Act No 587, Approved May 16, 1929, PL 1784, as last amended by Act No 409 of September 29, 1951

Commonwealth of Pennsylvania, County of Allegheny, ss K. Flaherty, being duly sworn, deposes and says that the Pittsburgh Post-Gazette, a newspaper of general circulation published in the City of Pittsburgh, County and Commonwealth aforesaid, was established in 1993 by the merging of the Pittsburgh Post-Gazette and Sun-Telegraph and The Pittsburgh Press and the Pittsburgh Post-Gazette and Sun-Telegraph was established in 1960 and the Pittsburgh Post-Gazette was established in 1927 by the merging of the Pittsburgh Gazette established in 1786 and the Pittsburgh Post, established in 1842, since which date the said Pittsburgh Post-Gazette has been regularly issued in said County and that a copy of said printed notice or publication is attached hereto exactly as the same was printed and published in the \_\_\_\_\_ regular \_\_\_\_\_ editions and issues of the said Pittsburgh Post-Gazette a newspaper of general circulation on the following dates, viz:

**27 of September, 2017**

Affiant further deposes that he/she is an agent for the PG Publishing Company, a corporation and publisher of the Pittsburgh Post-Gazette, that, as such agent, affiant is duly authorized to verify the foregoing statement under oath, that affiant is not interested in the subject matter of the afore said notice or publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.

K. Flaherty  
PG Publishing Company  
Sworn to and subscribed before me this day of:  
September 27, 2017

Linda M. Gaertner  
COMMONWEALTH OF PENNSYLVANIA  
NOTARIAL SEAL  
Linda M. Gaertner, Notary Public  
Findlay Twp., Allegheny County  
My Commission Expires Jan. 31, 2019  
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

**STATEMENT OF ADVERTISING COSTS**

Buchanan Ingersoll & Rooney PC  
409 N. Second Street, Suite 500  
ATTN: Gina Myers  
HARRISBURG PA 17101-1357

To PG Publishing Company

Total ----- \$510.00

**Publisher's Receipt for Advertising Costs**

PG PUBLISHING COMPANY, publisher of the Pittsburgh Post-Gazette, a newspaper of general circulation, hereby acknowledges receipt of the aforesaid advertising and publication costs and certifies that the same have been fully paid.

Office  
2201 Sweeney Drive  
CLINTON, PA 15026  
Phone 412-263-1338

PG Publishing Company, a Corporation, Publisher of  
Pittsburgh Post-Gazette, a Newspaper of General Circulation

By \_\_\_\_\_

I hereby certify that the foregoing is the original Proof of Publication and receipt for the Advertising costs in the subject matter of said notice.

Attorney For

**COPY OF NOTICE OR PUBLICATION**

PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE Applications of Interactive Energy Group LLC For Approval To Offer, Render, or Furnish Services as a Marketer/Broker Engaged In The Business Of Supplying Natural Gas Supply Services and Electricity Supply or Electric Generation Services, To The Public In The Commonwealth Of Pennsylvania. Interactive Energy Group LLC will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as a broker/marketer engaged in the business of providing natural gas services. Interactive Energy Group LLC will also be filing an application with the PUC for a license to supply electricity or electric generation services as broker/marketer engaged in the business of supplying electricity. Interactive Energy Group LLC proposes to sell electricity, natural gas, and related services within the Entire Commonwealth of Pennsylvania under the provisions of the new Natural Gas Choice and Competition Act and the Electricity Generation Customer Choice and Competition Act. The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of Interactive Energy Group LLC may be filed within 15 days of the date of this notice with the Secretary of the PUC, 400 North Street, Harrisburg, PA 17120. You should send copies of any protest to Interactive Energy Group LLC at the address listed below. Interactive Energy Group LLC, c/o John F. Povilaitis, Buchanan Ingersoll & Rooney PC, 409 N. Second Street, Suite 500, Harrisburg, PA 17101, 717 237 4825

The Scranton Times (Under act P.L. 877 No 160. July 9, 1976)  
Commonwealth of Pennsylvania, County of Lackawanna

BUCHANAN INGERSOLL & ROONEY PC  
GINA Y. MYERS  
SUITE 500 409 NORTH SECOND STREET  
HARRISBURG PA 17101-1503

Account # 444276  
Order # 82130897  
Ad Price: 283.00

INTERACTIVE ENERGY GROUP  
Gina Krushinski

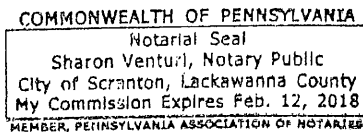
Being duly sworn according to law deposes and says that (s)he is Billing clerk for The Scranton Times, owner and publisher of The Scranton Times, a newspaper of general circulation, established in 1870, published in the city of Scranton, county and state aforesaid, and that the printed notice or publication hereto attached is exactly as printed in the regular editions of the said newspaper on the following dates:

09/27/2017

Affiant further deposes and says that neither the affiant nor The Scranton Times is interested in the subject matter of the aforesaid notice or advertisement and that all allegations in the foregoing statement as time, place and character or publication are true Gina Krushinski

Sworn and subscribed to before me  
this 27th day of September A.D., 2017

Sharon Venturi  
(Notary Public)



LEGAL NOTICE

**PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE**  
Applications of **Interactive Energy Group LLC** For Approval To Offer, Render, or Furnish Services as a **Marketer/Broker** Engaged In The Business Of Supplying Natural Gas Supply Services and Electricity Supply or Electric Generation Services To The Public In The Commonwealth Of Pennsylvania.

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The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of **Interactive Energy Group LLC** may be filed within 15 days of the date of this notice with the Secretary of the PUC, 400 North Street, Harrisburg, PA 17120. You should send copies of any protest to **Interactive Energy Group LLC** at the address listed below.

Interactive Energy Group LLC  
c/o John F. Povillaitis  
Buchanan Ingersoll & Rooney PC  
409 N. Second Street, Suite 500  
Harrisburg, PA 17101  
717-237-4825

PROOF OF PUBLICATION OF NOTICE IN THE WILLIAMSPORT  
SUN-GAZETTE UNDER ACT NO. 587, APPROVED MAY 16, 1929

STATE OF PENNSYLVANIA  
COUNTY OF LYCOMING

SS:

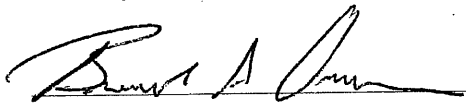
Bernard A. Oravec, Publisher of the Sun-Gazette LLC publishers of the Williamsport Sun-Gazette, successor to the Williamsport Sun and the Gazette & Bulletin, both daily newspapers of general circulation, published at 252 West Fourth Street, Williamsport, Pennsylvania, being duly sworn, deposes and says that the Williamsport sun was established in 1870 and the Gazette & Bulletin was established in 1801, since which dates said successor, the Williamsport Sun-Gazette, has been regularly issued and published in the County of Lycoming aforesaid, and that a copy of the printed notice is attached hereto exactly as the same was printed and published in the regular editions of said Williamsport Sun-Gazette on the following dates, viz:

September 27, 2019

Affiant further deposes that he is an officer daily authorized by the Sun-Gazette LLC, publisher of the Williamsport Sun-Gazette, to verify the foregoing statement under oath and declare that affiant is not interested in the subject matter of the aforesaid notice of publication, and that all the allegations in the foregoing statement as to time, place and character of publication are true.

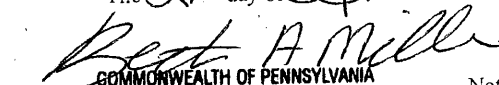
**PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE**  
Applications of **Interactive Energy Group LLC** For Approval To Offer, Render, or Furnish Services as a **Marketer/Broker** Engaged in The Business Of Supplying Natural Gas Supply Services and Electricity Supply or Electric Generation Services, To The Public In The Commonwealth Of Pennsylvania.  
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The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of **Interactive Energy Group LLC** may be filed within 15 days of the date of this notice with the Secretary of the PUC, 400 North Street, Harrisburg, PA 17120. You should send copies of any protest to **Interactive Energy Group LLC** at the address listed below.  
**Interactive Energy Group LLC**  
c/o John F. Povillaitis  
Buchanan Ingersoll & Rooney PC  
409 N. Second Street,  
Suite 500  
Harrisburg, PA 17101  
717 237 4825

  
SUN-GAZETTE LLC

Sworn to and subscribed before me

The 27th day of September 2019

  
COMMONWEALTH OF PENNSYLVANIA

**NOTARIAL SEAL**  
**BETH A MILLER**  
Notary Public  
CITY OF WILLIAMSPORT, LYCOMING COUNTY  
My Commission Expires Apr 18, 2020

Notary Public

STATEMENT OF ADVERTISING COSTS

To the Sun-Gazette LLC, Dr.:  
For publishing the notice attached  
Hereto on the above state dates.....\$ 298.64  
Probated same.....\$  
Total.....\$ 298.64

PUBLISHER'S RECEIPT FOR ADVERTISING COSTS

THE SUN-GAZETTE LLC hereby acknowledges receipt of the aforesaid advertising and publication costs and certifies that the same have been fully paid

SUN-GAZETTE LLC

BY Bernard A. Oravec



COMMONWEALTH OF PENNSYLVANIA }  
 County of Cambria } SS

PENNSYLVANIA  
 PUBLIC UTILITY COMMISSION  
 NOTICE

Applications of Interactive Energy Group LLC For Approval To Offer, Render, or Furnish Services as a Marketer/Broker Engaged In The Business Of Supplying Natural Gas Supply Services and Electricity Supply or Electric Generation Services, To The Public In The Commonwealth Of Pennsylvania.

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*published that the a of The Joi interested character*

Interactive Energy Group LLC  
 c/o John F. Povillaitis  
 Buchanan Ingersoll & Rooney PC  
 409 N. Second Street, Suite 500  
 Harrisburg, PA 17101  
 717 237 4825

On this 27th day of September A.D. 2017, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Christine Marhefka, who being duly sworn according to law, deposes and says as Sales Manager / Major Accounts of the Tribune-Democrat, Johnstown, PA, a newspaper of general circulation as defined by the "Newspaper Advertising Act", a merger September 8, 1952, of the Johnstown Tribune, established December 7, 1853; and of the Johnstown Democrat, established March 5, 1863,

ty of Cambria, and Commonwealth of Pennsylvania and e matter published in said publication in the regular issues , on September 27, 2017; and that the Affiant is not rtising and that all of the allegations as to time, place and

*Christine Marhefka*

STATEMENT OF ADVERTISING COSTS

Sworn and Subscribed before me this 27th day of September, 2017.

*[Signature]*

0.00 Lines @ \$2.50 per line	0.00
7.5 Inches @ \$25.00 per inch	187.50
Notary Fee	5.00
Clerical Fee	2.50
<b>Total Cost</b>	<b>195.00</b>

COMMONWEALTH OF PENNSYLVANIA  
 NOTARIAL SEAL  
 Vivian Ohs, Notary Public  
 City of Johnstown, Cambria County  
 My Commission Expires Dec. 6, 2020  
 MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

To The Tribune-Democrat, Johnstown, PA  
 For publishing the notice or publication  
 attached hereto on the above stated dates.

PUBLISHER'S RECEIPT FOR ADVERTISING COSTS

\_\_\_\_\_ for publisher of \_\_\_\_\_  
 a newspaper of general circulation, hereby acknowledges receipt of the aforesaid  
 and publication costs and certifies that the same has been duly paid.

\_\_\_\_\_  
 (Name of Newspaper)

By \_\_\_\_\_

Electronic Data Interchange Contacts (Appendix H).

Not applicable

## **ATTACHMENTS**

### **Interactive Energy Group LLC Pennsylvania NGS License Application**


<b><u>ATTACHMENT</u></b>	<b><u>DESCRIPTION</u></b>
Attachment 1	Proof of compliance with appropriate Department of State filing requirements
Attachment 2	The state in which the business is incorporated/organized/formed and copy of the charter documentation  <b><u>CONFIDENTIAL</u></b> – Joint Written Consent of Board of Directors regarding Name Change to Interactive Energy Group LLC
Attachment 3	Names and Address of Officers
Attachment 4	Experience, Plan, Structure – Technical and Managerial Competency, and Jurisdictions of Operation
Attachment 5	Officers Resume
Attachment 6	<b><u>CONFIDENTIAL</u></b> – Compliance
Attachment 7	Annual Reports for 2016 and 2017
Attachment 8	Letters from NGDCs Regarding Bond or Security Requirement

Attachment 1

Proof of compliance with appropriate Department of State filing requirements.

Entity# : 6602036  
Date Filed : 09/06/2017  
Pedro A. Cortés  
Secretary of the Commonwealth

PENNSYLVANIA DEPARTMENT OF STATE  
BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS

<input type="checkbox"/> Return document by mail to: <u>Csc order # 793538-10</u> <u>LBW</u> Name Address CSC (xx) Return document by email to: <u>cscpa@cscglobal.com</u>	Foreign Registration Statement DSCB:15-412 (rev 2/2017)  TCO170906JF1112
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Read all instructions prior to completing. This form may be submitted online at <https://www.corporations.pa.gov/>.

Fee: \$250

I qualify for a veteran/reservist-owned small business fee exemption (see instructions)

In compliance with the requirements of the applicable provisions of 15 Pa.C.S. § 412 (relating to foreign registration statement), the undersigned foreign association hereby states that:

1. The type of association is (check only one):

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Business Corporation                 | <input type="checkbox"/> Limited Partnership                     | <input type="checkbox"/> Business Trust           |
| <input type="checkbox"/> Nonprofit Corporation                | <input type="checkbox"/> Limited Liability (General) Partnership | <input type="checkbox"/> Professional Association |
| <input checked="" type="checkbox"/> Limited Liability Company | <input type="checkbox"/> Limited Liability Limited Partnership   |   |

2. The full and proper name of the foreign association as registered in its jurisdiction of formation is:

INTERACTIVE ENERGY GROUP LLC

2A. If the name in 2 does not contain a required designator or if the name in 2 is not available for use in the Commonwealth, the alternate name under which the association is registering in this Commonwealth is:

3. The jurisdiction of formation is: DELAWARE

4. The street and mailing address of the association's principal office.

<u>5251 WESTHEIMER RD SUITE 1000</u>	<u>HOUSTON</u>	<u>TX</u>	<u>77056</u>
Number and street	City	State	Zip

4A. The street and mailing address of the office, if any, required to be maintained by the law of the association's jurisdiction of formation in that jurisdiction:

<u>5251 WESTHEIMER RD SUITE 1000</u>	<u>HOUSTON</u>	<u>TX</u>	<u>77056</u>
Number and street	City	State	Zip

2017 SEP -6 PM 1:16

PA. DEPT. OF STATE

5. The (a) address of the association's proposed registered office in this Commonwealth or (b) name of its Commercial Registered Office Provider and the county of venue is:

Complete part (a) OR (b) – not both:

(a) \_\_\_\_\_  
 Number and street City State Zip County

**OR**

(b) c/o: Corporation Service Company Dauphin  
 Name of Commercial Registered Office Provider County

6. Check one of the following:

- The association may not have series.
- The association may have one or more series.

7. Effective date of registration of foreign association (check, and if appropriate complete, one of the following):

- The Foreign Registration Statement shall be effective upon filing in the Department of State.
- The Foreign Registration Statement shall be effective on: \_\_\_\_\_ at \_\_\_\_\_  
 Date (MM/DD/YYYY) Hour (if any)

8. To be completed by Limited Liability Companies only. Check, and if appropriate complete, one of the following:

- The association is a limited liability company which is not organized to render any of the below professional service(s).
- The association is a restricted professional limited liability company organized to render one or more of the following professional service(s): (If this box is checked, one or more of the fields below must be checked.)

<input type="checkbox"/> Chiropractic	<input type="checkbox"/> Dentistry	<input type="checkbox"/> Law	<input type="checkbox"/> Medicine and surgery
<input type="checkbox"/> Optometry	<input type="checkbox"/> Osteopathic medicine and surgery	<input type="checkbox"/> Podiatric medicine	<input type="checkbox"/> Public accounting
<input type="checkbox"/> Psychology	<input type="checkbox"/> Veterinary medicine		

IN TESTIMONY WHEREOF, the undersigned association has caused this Foreign Registration Statement to be signed by a duly authorized representative thereof this 6TH day of AUGUST, 2017.

INTERACTIVE ENERGY GROUP LLC  
Name of Association

/s/ Jonah Davids  
Signature

CORPORATE SECRETARY  
Title

Attachment 2

The state in which the business is incorporated/organized/formed and provide a copy of the charter documentation.

## CERTIFICATE OF CHANGE OF

HE HOLDINGS, LLC

*(Insert Name of Foreign Limited Liability Company)*

Under Section 804-A of the Limited Liability Company Law

**FIRST:** The name of the foreign limited liability company is:

HE HOLDINGS, LLC

If applicable, the fictitious name the foreign limited liability company has agreed to use in this state is: HUDSON ENERGY HOLDINGS, LLC

**SECOND:** The application for authority was filed with the Department of State on:

May 26, 2009

**THIRD:** The change(s) effected hereby are: *(Check appropriate statement(s))*

The county location, within this state, in which the office of the foreign limited liability company is located, is changed to: \_\_\_\_\_

The address to which the Secretary of State shall forward copies of process accepted on behalf of the foreign limited liability company is changed to read in its entirety as follows:

c/o Corporation Service Company  
80 State Street, Albany, NY 12207-2543

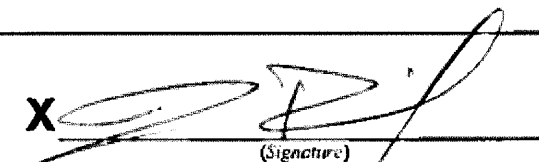
The foreign limited liability company hereby: *(check one)*

Designates \_\_\_\_\_  
as its registered agent upon whom process against the foreign limited liability company may be served. The street address of the registered agent is: \_\_\_\_\_

Changes the designation of its registered agent to: Corporation Service Company  
The street address of the registered agent is:  
80 State Street, Albany, NY 12207-2543

Changes the address of its registered agent to: \_\_\_\_\_

Revokes the authority of its registered agent.

**X**   
(Signature)

Jonah Davids

(Type or print name)

Vice President

(Title of signer)



**CERTIFICATE OF CHANGE  
OF  
HE HOLDINGS, LLC**

*(Insert Name of Foreign Limited Liability Company)*

---

**Under Section 804-A of the Limited Liability Company Law**

Filed by: McKenna Long & Aldridge LLP  
*(Name)* Attn: Carol McEwen

Suite 5300, 303 Peachtree Street  
*(Mailing address)*

Atlanta, GA 30308  
*(City, State and ZIP code)*

**NOTE:** This form was prepared by the New York State Department of State for filing a certificate of change by a foreign limited liability company. You are not required to use this form. You may draft your own form or use forms available at legal supply stores. The Department of State recommends that legal documents be prepared under the guidance of an attorney. The certificate must be submitted with a \$30 filing fee made payable to the Department of State.

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*(For office use only)*


# Delaware

Page 1

The First State

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF AMENDMENT OF "HE HOLDINGS, LLC", CHANGING ITS NAME FROM "HE HOLDINGS, LLC" TO "INTERACTIVE ENERGY GROUP LLC", FILED IN THIS OFFICE ON THE EIGHTH DAY OF AUGUST, A.D. 2017, AT 1:30 O`CLOCK P.M.



  
Jeffrey W. Bullock, Secretary of State

4667879 8100  
SR# 20175623894

Authentication: 203021051  
Date: 08-08-17

You may verify this certificate online at [corp.delaware.gov/authver.shtml](http://corp.delaware.gov/authver.shtml)

## STATE OF DELAWARE CERTIFICATE OF AMENDMENT

1. Name of Limited Liability Company: HE HOLDINGS, LLC

2. The Certificate of Formation of the limited liability company is hereby amended as follows:

The name of the limited liability company is  
Interactive Energy Group LLC.

IN WITNESS WHEREOF, the undersigned have executed this Certificate on  
the 4<sup>th</sup> day of August, A.D. 2017.

By: 

Authorized Person(s)

Name: Jonah Davids

Print or Type

APPROVED  
BY LEGAL  


Attachment 3

Name and address of officers.

**“Primary Corporate Officers/General Partners/Managing Partners”**

<b>Directors</b>	<b>Name of Officer</b>	<b>Position</b>	<b>Business Address</b>
Deb Merrill	Deb Merrill	Co-CEO and President	<b>Suite 1000 – 5251 Westheimer Road, Huston, Texas, U.S. 77056</b>
James Lewis	James Lewis	Co-CEO and President	<b>Suite 1000 – 5251 Westheimer Road, Huston, Texas, U.S. 77056</b>
	Patrick McCullough	Chief Financial Officer	<b>Suite 1000 – 5251 Westheimer Road, Huston, Texas, U.S. 77056</b>
	Jonah Davids	EVP, General Counsel and Corporate Secretary	<b>Suite 400 – 6345 Dixie Road Mississauga, Ontario, Canada L5T 2E6</b>
	Brent Moore	President, Interactive Energy Group LLC.	<b>Suite 228 - 6860 Dallas Parkway, Plano, TX 75024</b>

Attachment 4  
Experience, Plan, Structure

## **“Technical and Managerial Competency”**

### **Company History**

Interactive Energy Group LLC (IEG) is a commercial energy broker who currently has a portfolio of customers in the U.S. (primarily in Texas). The IEG core team has been together for many years. IEG currently has ~800 customer contracts and ~30,000 RCEs. The company headquarters is in Plano, Texas and the company has 8 internal employees.

IEG facilitates the introduction of customers to the Supplier and will engage on behalf of the customer should any issues arise, when applicable. The customer will enter into a contract directly with the Supplier. 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.

On August 1, 2017, Just Energy Group Inc. (NYSE-JE; TSX-JE) (“Just Energy”) indirectly acquired assets of a commercial brokerage, including all customer relationships and has rebranded the company as IEG. The entire commercial brokerage team has transitioned over to IEG. IEG will operate as an independent broker from Just Energy. Established in 1997, Just Energy is a leading electricity and natural gas retailer, and a competitive retailer of renewable energy credits and carbon offsets in North America serving 1.6 million customers.

### **Experience and Plans**

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 Pennsylvania for all utilities. All customer billing, TPV, etc. will be completed by the Supplier.

### **Summary of Experience**

## **Operations**

IEG 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.

## **Operations Expertise**

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.



**“Jurisdictions of Operation”**

<b>Affiliate</b>	<b>Province/State</b>	<b>License Type</b>	<b>License Order/Docket #</b>
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-16-15
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 Solar Holdings Corp.	Delaware		File number: 5666263
Just Energy Solutions Inc.	Georgia	Gas	GM-30
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
Just Energy Manitoba L.P.	Manitoba	Gas	622
Just Energy Solutions Inc.	Maryland	Electric	IR-639
Just Energy Solutions Inc.	Maryland	Gas	IR-737
Hudson Energy Services, LLC	Maryland	Electric	IR-1114
Hudson Energy Services, LLC	Maryland	Gas	IR-1120
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
<b>Affiliate</b>	<b>Province/State</b>	<b>License Type</b>	<b>License Order/Docket #</b>

Just Energy Solutions Inc.	Nevada	Gas	G-13
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
Fulcrum Retail Energy New York, LLC	New York	Electric	Approved ESCO
Fulcrum Retail Energy New York, LLC	New York	Gas	Approved ESCO
Just Energy New York Corp.	New York	Electricity	Approved ESCO
Just Energy New York Corp.	New York	Gas	Approved ESCO
Just Energy Solutions Inc.	New York	Electricity	Approved ESCO
Just Energy Solutions Inc.	New York	Gas	Approved ESCO
Hudson Energy Services, LLC	New York	Gas	Approved ESCO
Hudson Energy Services, LLC	New York	Electric	Approved ESCO
Just Energy Solutions Inc.	Ohio	Electric	Certificate 01-74E (8)
Just Energy Solutions Inc.	Ohio	Gas	Certificate 02-023
Hudson Energy Services, LLC	Ohio	Gas	Certificate 12-271G (3)
Hudson Energy Services, LLC	Ohio	Electric	Certificate 12-538 E (3)
Universal Energy Corporation	Ontario	Electricity	ER-2016-0332
Universal Energy Corporation	Ontario	Gas	GM-2016-0261
Just Energy Ontario L.P.	Ontario	Gas	GM-2015-0119
Just Energy Ontario L.P.	Ontario	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
<b>Affiliate</b>	<b>Province/State</b>	<b>License Type</b>	<b>License Order/Docket #</b>
Just Energy Pennsylvania Corp.	Pennsylvania	Electric (Duquesne)	A-2009-2097544

<b>Hudson Energy Services, LLC</b>	<b>Pennsylvania</b>	<b>Electric</b>	<b>A-2010-2192137</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</b>	<b>Texas</b>	<b>Electric</b>	<b>REP Certification No. 10081</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. 30061</b>
<b>Tara Energy, LLC</b>	<b>Texas</b>	<b>Electric</b>	<b>REP Certification No. 10052</b>
<b>Just Energy Solutions Inc.</b>	<b>Virginia</b>	<b>Gas</b>	<b>G-30</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>Electricity</b>	<b>FERC - ER10-379</b>
<b>Just Energy Solutions Inc.</b>	<b>US Federal</b>	<b>Electricity</b>	<b>FERC - ER97-4253</b>
<b>Just Energy New York Corp.</b>	<b>US Federal</b>	<b>Electricity</b>	<b>FERC - ER13-1081-000</b>
<b>Just Energy Illinois Corp.</b>	<b>US Federal</b>	<b>Electricity</b>	<b>FERC - ER13-1104-000</b>

Attachment 5  
Officers Resume

## C. BRENT MOORE

4204 Caruth Blvd., Dallas, TX 75225

Mobile: (214) 707-7687 Email: bmoore@InteractiveEnergyGroup.com

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### VENTURE LEADERSHIP – SALES & MARKETING EXECUTIVE

#### Startup – High Growth

Entrepreneurial executive who builds and scales businesses – especially startups that disrupt existing business models. A forward thinker who is able to create and translate vision into tangible results by building and aligning world-class teams, acquiring customers and executing with precision. Known for high emotional intelligence and natural influence skills; able to quickly build customer and team relationships and drive sustainable results.

**Raising Investment Capital – M&A Negotiation – Organization Turnarounds – B2B & B2C Customer Acquisition**

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### ENTREPRENEURSHIP

**INTERACTIVE ENERGY GROUP, Dallas, TX** [www.InteractiveEnergyGroup.com](http://www.InteractiveEnergyGroup.com) **2017 – Present**

*A wholly owned subsidiary of Just Energy Group Inc. (NYSE-JE; TSX-JE), IEG is a leading one-stop energy supply management company providing energy procurement and risk management for commercial energy users.*

#### **President (IEG) and Vice President (JE)**

As key member of the senior management team for the commercial energy division, lead overall strategic direction, partnerships, business development, and finance for a 10 employee brokerage team. The company will soon be expanding its team, geographical footprint domestically and internationally and will grow its suite of products and services.

***Formerly the commercial energy brokerage and consulting division of Save On Energy, LLC. acquired indirectly by Just Energy Group Inc. on August 1<sup>st</sup>, 2017***

**RED VENTURES, Dallas, TX** [www.RedVentures.com](http://www.RedVentures.com) **2012 – 2017**

*A 3,500 employee technology-focused sales and marketing company acquiring millions of customers for over 30 well-respected brands. Acquired Save On Energy, LLC in 2012*

#### **Senior Vice President**

As key member of the senior management team for the energy vertical, lead overall strategic direction, partnerships, and business development for a 300 employee business unit

#### ***Increased profitability 10x from date of Save On Energy acquisition***

- Following the acquisition, integrated Save On Energy into the Red Ventures technology and customer acquisition platform, quickly and exponentially expanding market penetration and revenue generation
  - Secured all retailer partnerships
  - Renegotiated all of the retailer agreements, enhancing Save On Energy's compensation structure and strengthening its business terms
  - Led the enrollment Application Programming Interface (API) technology integrations including online cart and phone center operations
  - Created, negotiated, and implemented the first industry accepted universal credit check allowing Save On Energy marketplace customers to only need one credit check to shop multiple providers
  - Leading expansion into the Northeast markets, Canada and the UK
  - Completed an additional acquisition of a competitor and have others in process
- Created and leading a new energy business unit focusing on energy procurement and consulting services for large commercial and industrial businesses

- Leading Save On Energy into the utility expense management business, providing a path for lucrative company expansion into regulated markets

**SAVE ON ENERGY, LLC, Dallas, TX** [www.SaveOnEnergy.com](http://www.SaveOnEnergy.com) **2003 – 2012**  
*Energy industry innovator and on-line comparison shopping marketplace sold to Red Ventures in 2012*

**CEO and Founder**

As a pioneer in the digital channel for retail energy, led strategic direction of the company and oversaw all operational aspects of the business

***Built the company from conception to industry leadership and sold it profitably to a technology powerhouse***

- Created the company's business model and developed its brand in the newly deregulated energy industry
- Forged relationships with incumbents and other major market entrants
- After initially funding the business from personal capital, obtained \$2.4 million in equity and debt in exchange for a minority stake in the company
- Developed a revenue generating engine that helped forge a new channel (online/digital) for retailers as deregulation became a market reality

## TELECOMMUNICATIONS SALES & MARKETING

**AIRBAND COMMUNICATIONS, Dallas, TX (acquired by United Network Services, Inc/UNSi in 2013)** **2001 – 2003**  
*By 2013, the largest Fixed Wireless Provider in the U.S. with nationwide VoIP services.*

**Executive Vice President, Sales & Marketing**

Headed sales, marketing, and business development with 100 employees covering all of the company's markets. In the face of losing the remaining capital provided by a group of leading venture capital firms and impeding any additional funding, turned around revenue generation, cash flows, and overall profitability that resulted in C-round financing of an additional \$15 million. Grew revenues from \$7 million to \$30 million annually.

**WINSTAR COMMUNICATIONS, INC. Dallas, TX (acquired by IDT Corp. in 2001)** **1999 – 2001**  
*Provider of broadband services to business customers in 60 major U.S. markets and 10 international markets.*

**Vice President & General Manager**

Hired to turnaround one of the company's worst performing regions. With full P&L responsibility, headed the Dallas, Ft. Worth, and Austin branches, oversaw 125 employees, grew revenue to \$50 million, and became one of the top performing regions in the company.

**CAPROCK COMMUNICATIONS, Dallas, TX (acquired by McLeod USA Inc. in 2000)** **1996 – 1999**  
*Provider of integrated voice and data services to small and medium-sized businesses.*

**Director of Sales**

Led the channel sales and service organization with 25 employees and 300 independent sales agents throughout the Southwest. Created products, marketing materials, and sales compensation plans. Grew revenue from \$5 to \$30 million.

**MFS COMMUNICATIONS COMPANY, Dallas, TX (acquired by WorldCom in 1996)** **1994 – 1996**  
*Provider of last mile business grade telecommunications products such as long distance and Internet access through its own fiber rings in major central business districts throughout North America and Europe.*

**Agent Sales Manager**

Acquired customers and sold long distance products to small and medium-sized businesses. Trained and managed sales agents in Texas. Grew territory to 50 sales agents and averaged 150% to plan. Achieved #1 ranking in the U.S. for all 14 months in the position.

**MCI COMMUNICATIONS CORP., Dallas, TX (now part of Verizon)**

**1993 – 1994**

*Grew to be the 2<sup>nd</sup> largest long distance provider in the U.S. by 1998, when it was acquired by WorldCom.*

**Territory Sales Representative**

Sold MCI products to small and medium-sized businesses. Consistently ranked in top 5% in Dallas and top 15% in the region.

**EDUCATION**

**BA, Psychology, Texas State University, San Marcos, TX, 1993**

# Sean A. Holland

16015 Elmwood Manor Dr. ▪ Cypress, Texas 77429  
Phone (281) 684-8748 ▪ E-mail tecaso\_sean@yahoo.com

## PROFESSIONAL EXPERIENCE

### **Interactive Energy Group**

#### **Chief Operating Officer**

**August 2017 – Present**

As a key member of the senior management team for the commercial energy division, own the P&L and lead overall Finance, Operations, Accounting and Strategic Direction. The company will soon be expanding its team, geographical footprint domestically and internationally and will grow its suite of products and services.

### **Hudson Energy**

#### **Director, Operations**

**July 2014 – July 2017**

Led Operations for the commercial division (Hudson Energy) of Just Energy for North America.

- Created and managed the analytics team for Hudson
- Led the Billing, Remittance and Transaction Management function

### **Entrust Energy**

#### **Director, Finance**

**August 2012 – July 2014**

Led all Finance and Accounting activities for the business and presented Accounting results and all Finance related activities (e.g., Operating Plan, variance analytics, etc.) at the company board meetings.

- Closed the books each month in accordance with US GAAP and provided variance analytics to the Board
- Created an excel based plan for the business and provided quarterly refreshes of the plan and present to the Board for approval
- Created the Treasury function to optimize cash management, ensure payments are made in a timely manner and to provide a clear view of future cash needs
- Analyzed several supply deals to ensure that the company maximized limited cash resources and negotiated the deal
- Developed a Sales Valuation Model (SVM) to prioritize market and sales opportunities for the business
- Established the pricing function and prepare detailed competitive analytics for all markets
- Lead the FP&A function and model all potential business opportunities and key investment decisions and work with all business functions to optimize business operations and performance

### **SPARK ENERGY**

#### **Director, Sales and Marketing**

**July 2012 – August 2012**

Led the team responsible for achieving monthly and annual sales and retention targets for all customers in approximately seventeen markets.

- Developed a sales and retention strategy to be aligned with corporate objectives during a period of uncertainty and a shift in strategy
- Managed all sales channels (identifying target market through the enrollment process)
- Managed numerous vendors to ensure that tasks were running efficiently and made several recommendations to either outsource or bring functions in house

#### **Director, Portfolio Management**

**July 2011 – June 2012**

Led the team responsible for achieving short-term and long-term company gross margin targets for fifteen diverse power markets.

- Prepared all forward gross margin forecasts (i.e. plan, quarterly plan refreshes) and at the end of each month, provided a variance analysis to explain deviations from these estimates
- Developed complex dashboards and scorecards to explain variances from forecasts and to measure and quantify key performance metrics in each market
- Optimized the gross margin life cycle and created unique value propositions through coordinated cross functional efforts with various teams throughout the organization (e.g., Energy Supply, IT, Operations, Financial Planning and Analytics, Pricing, Sales and Marketing, Accounting, Retention, etc.)
- Decision maker and prepared performance and business analytics on key business drivers (e.g., margin, product structure, sales campaigns, strategic direction, etc.)
- Partnered with Energy Supply to create optimal hedging strategies which were aligned with the corporate risk policy to ensure optimal margin capture



## **Director, Finance**

**September 2010 – July 2011**

Established and led the team responsible for margin capture, residential power pricing, bank reporting, covenant and cash flow projections, financial analytics, M&A activity and all planning efforts.

- Created an automated excel based plan for the business and maintained the inputs and outputs for each run in a database
- Prepared the annual Operating Plan and quarterly refreshes for Spark and affiliated companies (i.e. Cash Flow, Balance Sheet and Income Statement) and worked with input owners to develop their go-forward strategy (e.g., Sales, Marketing, Operations, etc.)
- Developed all financial models required by the business and clearly articulated results to executive leadership (e.g., M&A modeling, investment decisions, liquidity forecasting, etc.)
- Led all performance and business analytics and developed complex “Valuation Models” to determine company profitability in all markets
- Managed bank covenants and other financial reporting, including cash flow forecasting models to assist with covenant reporting and compliance
- Established the residential power pricing function and worked with various stakeholders throughout the organization (Sales, Marketing, Energy Supply, etc.) to develop pricing strategies

## **DIRECT ENERGY**

### **Senior Manager, Finance**

**November 2009 – September 2010**

Led the team responsible for M&A modeling for all residential business units and financial modeling and analytics, optimizing business unit performance and the planning function for the U.S. North business unit.

- Led all M&A modeling efforts and was the Finance representative on all transactions
- Developed complex models to understand key business issues (e.g., margin, liquidity, cash flow, etc.)
- Led all financial analytics and was the go-to source for providing financial expertise to help set the strategic vision and/or optimize performance for the U.S. North business unit
- Prepared the annual Operating Plan and quarterly refreshes and developed unique ways to clearly communicate performance relative to projections (e.g., dashboards, presentations, graphs, etc.)

### **Manager, Customer Profitability**

**August 2008 – November 2009**

Led the team and was responsible for determining the customer acquisition and retention strategy.

- Prepared all modeling efforts and developed complex analytics to understand the profitability by market to maximize earnings
- Partnered with the P&L owners of Texas, U.S. North and Canada to provide guidance and direction on the creation of their forecasts for the Operating Plan, quarterly plan refreshes and during the normal course of business
- Led numerous deep dive efforts for the business to understand key business issues (e.g., liquidity, hedging strategy, contract optimization, etc.)

### **Senior Financial Analyst, Finance**

**November 2007 – August 2008**

Responsible for preparing analytics and deep dives for complex business issues, transitioning the Accounting function from Toronto to Houston and ensuring gross margins actualized in a manner consistent with expectations.

- Developed the North American Lifetime Value Model (nominated for company Platinum Award) to quantify and rank-order profitability in all markets
- Worked with business executives to determine appropriate sales and retention strategies to employ given limited capital resources
- Performed numerous deep dives to address key business issues (e.g., liquidity, investment optimization, timing of sales campaigns, etc.)
- Member of team which transitioned Accounting function from Toronto to Houston and closely worked with Accounting to highlight and explain monthly variances to Operating Plan

## **DISTINCT INTERNATIONAL LLC**

### **Manager, Finance and Operations**

**August 2007 – November 2007**

Led the team responsible for determining the financial health of target companies, developed Operating Plans and established an emerging market hospitality and other real estate fund.

- Led all research efforts on Croatia’s tourism and real estate markets to determine the feasibility of acquiring real estate in the country
- Led the development of financial models (KFIs) to evaluate the financial health of a variety of businesses and targeted assets and developed action plans to turn-around underperforming assets
- Developed detailed financials and created Operating Plans for various affiliated companies

- Responsible for all business administration items including payroll and benefits services, commercial banking and commercial office space

## **DIRECT ENERGY**

### **Senior Financial Analyst, Finance**

**September 2006 – August 2007**

Responsible for developing the company strategy, creating the Operating Plan and all quarterly planning refreshes and evaluating and improving the financial performance of power assets for the wholesale business.

- Co-developed and organized a wholesale energy training course presented to the top 100 executives across North America
- Evaluated power generation asset performance using power asset backcast techniques to improve asset performance
- Developed wholesale planning models which were used to create the Operating Plan and all quarterly refreshes and prepared all reporting for the parent company

### **Financial Analyst, Finance**

**November 2005 – September 2006**

Responsible for evaluating and improving the financial performance of power and gas assets.

- Developed financial models (KFIs) to assess economic profitability of gas storage assets (e.g., intrinsic/extrinsic value capture, optimal injection/withdrawal schedule, etc.)
- Led the development of a backcast tool to evaluate historical gas asset storage performance versus optimal performance
- Prepared multiple sensitivity analyses to determine economic benefits of power plant improvements

## **TECASO**

### **Managing Director**

**September 2001 - Present**

Serve as Financial expert and responsible for managing all company activity in the pursuit of International power asset development and providing due-diligence services for the entire energy value chain and the complete asset life cycle.

- Lead the development of International energy projects, including meetings and contract negotiations with high ranking government officials
- Develop and review detailed financial models (KFIs) to assess economic profitability of energy assets (e.g., NPV, IRR, etc.)
- Prepare sensitivity analyses to determine optimal performance of energy assets and manage company technical experts to ensure appropriate expertise is aligned with each project
- Prepare detailed financials to raise capital through negotiation with numerous financial institutions

## **DELOITTE**

### **Senior Associate, Tax**

**March 2003 – November 2005**

Responsible for preparing financial statements and tax reporting for Fortune 500 financial service clients with \$250 million to \$4 billion in assets.

- Team lead and mentored and trained all new associates
- Gathered and analyzed bond, loan and equity transactions to determine the financial impact to the client's tax basis and reconciled cash flows
- Determined the financial impacts of corporate reorganizations, short/long-term gains/losses and hedge agreements on income
- Provided domestic clients with appropriate tax reporting for the IRS and authorized and prepared engagement letters for new business

## **EDUCATION**

**Texas A&M University – College Station, TX**

**B.B.A. Finance**

**M.S. Economics**

Attachment 6

Compliance

Attachment 6 contains sensitive confidential information and is filed separately under seal of confidentiality.

Attachment 7

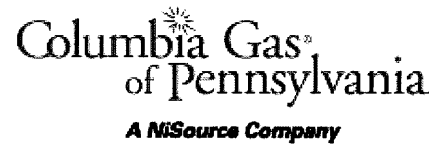
Annual Reports for 2016 and 2017

The Annual Reports of Applicant's affiliate, Just Energy, can be found at:  
<http://justenergygroup.com/financialreports/quarterlyannualreports.aspx>

Attachment 8

NGDC Letters Regarding Bond or Security Requirement

Columbia Gas of Pennsylvania, Inc.  
National Fuel Gas Distribution Corporation  
PECO Energy Company  
Peoples Natural Gas Company LLC  
Peoples Natural Gas Company LLC – Equitable Division  
Peoples Gas Company LLC (formerly, Peoples TWP)  
Philadelphia Gas Works  
UGI Utilities, Inc. – Gas Division  
UGI Central Penn Gas, Inc.  
UGI Penn Natural Gas, Inc.  
Valley Energy Inc.



September 13, 2017

Kristina Montgomery  
Interactive Energy Group  
5251 Westheimer Rd  
Houston, TX 77056

Dear Kristina Montgomery:

We are pleased that Interactive Energy Group has applied for a license to provide Natural Gas Broker/Marketer Services on the distribution system of Columbia Gas of Pennsylvania, Inc. ("Columbia Gas").

Under Paragraph 2.4.5 of the Rules Applicable to Distribution Service section of the Tariff of Columbia Gas, Interactive Energy Group could be required to provide to Columbia Gas a bond or other financial security instrument in an amount that Columbia Gas determines to be appropriate. Interactive Energy Group has indicated only brokering and consulting services will be provided. Therefore, we have determined at this time that Interactive Energy Group does not need a bond or other financial security requirement to provide broker natural gas services to Columbia Gas customers.

If the creditworthiness requirement or Columbia Gas' exposure to Interactive Energy Group changes in the future, Columbia Gas might deem it appropriate to require Interactive Energy Group to provide a bond or other financial security instrument.

Please feel free to contact me at 614-460-4712 should you have any questions regarding a bond or other financial security instrument requirements of Columbia Gas.

Sincerely,

*Patricia Chang*

Patricia Chang  
Manager of Choice and Transportation Support Services



**National Fuel**

October 30, 2017

Kristina Montgomery  
Manager, Regulatory Affairs & Government Relations  
Interactive Energy Group LLC  
5251 Westheimer Road, Suite 1000  
Houston, TX 77056

Re: Security Requirement for Interactive Energy Group LLC

Dear Kristina,

National Fuel Gas Distribution Corporation (“NFGDC”) is aware Interactive Energy Group LLC (IEG) has filed an application with the Pennsylvania Public Utility Commission to supply natural gas service to the public in Pennsylvania and specifically within the service territory of NFGDC.

As you know, in making such an application, IEG must furnish acceptable security to each utility where IEG will do business. As such, under its tariff, NFGDC could require IEG to provide a bond or other financial security instrument in an amount that NFGDC determines to be appropriate.

However, you have indicated, and it is NFGDC’s understanding that IEG intends only to provide natural gas aggregating, brokering and consulting services at this time. You have stated that, in performing these services, IEG will never take title to any delivered natural gas.

Based upon your representations, NFGDC has determined that, at this time, IEG does not need to post a bond or other form of security to operate in its service territory. However, if the services provided by IEG change in the future, NFGDC reserves the right to require security from IEG as it deems appropriate.

If you have any questions concerning the foregoing, please contact me at 716-857-7599.

Yours truly,

**Nathan E. Barnes**  
**Transportation Services Department**



An Exelon Company


September 21, 2017  
PECO - Exelon Corporation  
Energy Acquisition  
2301 Market Street  
Philadelphia, PA. 19101

Interactive Energy Group LLC.  
6860 Dallas Parkway, Suite 228, Plano, TX 75024  
5251 Westheimer Road, Suite 1000, Houston, TX 77056  
Email: [bmoore@Interactiveenergygroup.com](mailto:bmoore@Interactiveenergygroup.com)

PECO is aware that Interactive Energy Group LLC. has applied for a license to provide brokering and consulting services to commercial and industrial customers on the distribution system of PECO.

In making such an application, Interactive Energy Group LLC. could be required to provide to PECO a bond or other acceptable financial security in an amount that PECO determines to be appropriate. Interactive Energy Group LLC. has indicated that it intends to provide only brokering and consulting services to commercial and industrial customers will not take title to any delivered natural gas; nor will accept any customer payments or deposits. Therefore, PECO has determined at this time that Interactive Energy Group LLC. does not need a bond or other financial security requirement, since they are not directly engaging in business with PECO and only providing brokering or consulting services to PECO customers. However, if the services provided by Interactive Energy Group LLC. or the creditworthiness requirement for PECO's exposure to Interactive Energy Group LLC. changes in the future, PECO reserves the right to require Interactive Energy Group LLC. to provide a bond or other financial security instrument.

If you should have any questions regarding this matter, please contact the Electric & Gas Choice Hotline at 215-841-3700.

Sincerely,  
  
Carol Reilly  
Manager  
Energy Acquisition





375 North Shore Drive  
Pittsburgh, Pennsylvania 15212

[www.peoples-gas.com](http://www.peoples-gas.com)

**Lynda W. Petrichevich**  
Vice President, Regulatory Affairs

**Peoples Service Company LLC**  
Phone: 412-208-6528; Fax: 412-208-6577  
Email: [lpetrichevich@peoples-gas.com](mailto:lpetrichevich@peoples-gas.com)

September 14, 2017

**Brent Moore**  
President  
Interactive Energy Group LLC  
5251 Westheimer Road, Suite 1000  
Houston, TX 77056

Dear Mr. Moore:

We are pleased that Interactive Energy Group LLC has applied for a license to provide natural gas services on the Peoples Group of Companies. Specifically you have requested to be licensed as a supplier on the distribution systems of Peoples Natural Gas Company LLC, Peoples Natural Gas Company LLC – Equitable Division, and Peoples Gas Company LLC (formerly Peoples TWP) (“the Companies”).

Since Interactive Energy Group LLC is not currently serving customers on the Peoples systems, we have determined at this time that Interactive Energy Group LLC does not need a bond or other financial security requirement to provide these services to the Company’s customers.

If a Pool is established, and customers are enrolled which alters the creditworthiness requirement or the Company’s exposure to Interactive Energy Group LLC provision of services on the Peoples’ system changes in the future, the Companies may deem it appropriate to require a bond or other financial instrument.

If you have any questions feel free to contact me at 412-208-6528 or by email at [Lynda.W.Petrichevich@peoples-gas.com](mailto:Lynda.W.Petrichevich@peoples-gas.com).

Sincerely,

Lynda W. Petrichevich  
Vice President – Regulatory Affairs  
Peoples Natural Gas Company LLC

Cc: Carol Scanlon  
Stephen Kelly



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

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September 29, 2017

Ms. Kristina Montgomery  
Manager, Regulatory Affairs  
Interactive Energy Group  
5251 Westheimer Road  
Suite 1000  
Houston, TX 77056

Re: Security Requirement Bond for Interactive Energy Group

Dear Ms. Montgomery:

Philadelphia Gas Works ("PGW") is aware that Interactive Energy Group has filed an application with the Pennsylvania Public Utility Commission to supply natural gas services to the public in Pennsylvania and specifically within the services territory of Philadelphia Gas Works.

As you know, in making such an application, Interactive Energy Group must furnish acceptable security to each utility where Interactive Energy Group will do business. As such, under its tariff, Philadelphia Gas Works could require Interactive Energy Group to provide a bond or other financial security instrument in an amount that Philadelphia Gas Works determines to be appropriate.

However, you have indicated, and it is Philadelphia Gas Works' understanding, that Interactive Energy Group intends only to provide natural gas aggregating, brokering and consulting services at this time. You have stated that in performing these services Interactive Energy Group will never take title to any delivered natural gas.

Based upon your representations, Philadelphia Gas Works has determined that, at this time, Interactive Energy Group does not need to post a bond or other form of security to operate in its service territory. If the services provided by Interactive Energy Group should change, Philadelphia Gas Works reserves the right to require security from Interactive Energy Group as it deems appropriate.

If you have any questions concerning the foregoing, please contact me at 215-684-6725.

Sincerely,

  
John C. Zuk  
Vice President, Gas Supply

NL/dls



# VALLEY ENERGY

523 S. Keystone Avenue, P.O. Box 340, Sayre, PA 18840  
800/998-4427 • 570/888-9664 • FAX 570/888-6199

September 29, 2017

**VIA EMAIL**

Kristina Montgomery, Manager  
Regulatory Affairs & Government Relations  
Just Energy  
5251 Westheimer Rd., Suite 1000  
Houston, TX 77056  
[kmontgomery@justenergy.com](mailto:kmontgomery@justenergy.com)

**RE: Interactive Energy Group, LLC**

Dear Ms. Montgomery:

We understand that Interactive Energy Group, LLC has applied with the Pennsylvania Public Utility Commission to supply natural gas services to the public in Pennsylvania including our company's service area.

Because Interactive Energy Group, LLC intends to only provide natural gas aggregating, brokering and consulting services at this time, we have determined that Interactive Energy Group, LLC will not be required to post a bond or other form of financial security instrument to provide these services in our service area. However, if the services provided change in the future, we reserve the right to require security from Interactive Energy Group, LLC as deemed appropriate.

If you have any questions, please contact Jamie Levering at 570-888-9664.

Sincerely,

Edward E. Rogers  
President & CEO

EER/ss

cc: J. Levering, Valley Energy