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October 21, 2021

VIA E-FILING (PUBLIC VERSION) AND
OVERNIGHT DELIVERY (CONFIDENTIAL VERSION)

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

Re: Hudson Energy Services, LLC. Request For Renewal of a Reduction In Level of
Security; Docket No. A-2010-2192137

Dear Secretary Chiavetta:

On September 20, 2021, Hudson Energy Services, LLC. ("Hudson"), a licensed energy generation supplier ("EGS"), filed its Compliance Filing with the Pennsylvania Public Utility Commission ("PaPUC" or "Commision") to obtain renewal of its reduced 5% security requirement. On September 29, 2021, Hudson filed its Supplemental Compliance Filing which included proof of payment of the Supplemental Assessment fee due October 10, 2021 (Confidential Attachment 5). On October 1, 2021, the PaPUC Staff denied, via Secretarial Letter, Hudson's request to maintain its Electric Generation Supplier ("EGS") financial security level of 5% of its most recent four quarters of revenue. Enclosed for filing today at the above-captioned docket is Hudson's Petition for Reconsideration of Pennsylvania Public Utility Commission Staff Action ("Petition").

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

Please note that we are filing the public version electronically on the Commission's website and the confidential version is being filed by overnight delivery.

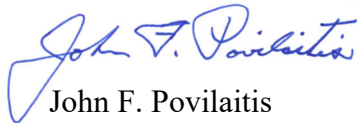
October 21, 2021

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

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

Very truly yours,



John F. Povilaitis

JFP/tlg

Enclosures

cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Hudson Energy Services, LLC.	:	Docket No. A-2010-2192137
Request for Renewal of a Reduction	:	Utility Code: 1112538
in Level of Security	:	

**PETITION OF HUDSON ENERGY SERVICES, LLC FOR RECONSIDERATION OF
PENNSYLVANIA PUBLIC UTILITY COMMISSION STAFF ACTION**

Pursuant to Section 5.44 of the Pennsylvania Public Utility Commission’s (“Commission”) regulations, 52 Pa. Code § 5.44, Hudson Energy Services, LLC. (“Hudson” or “the Company”) petitions for reconsideration of the Commission Staff’s October 1, 2021 denial by Commission Secretarial letter of the Company’s request at the above-captioned docket to maintain its Electric Generation Supplier (“EGS”) financial security level of 5% of its most recent four quarters of revenue. In support of this Petition for Reconsideration of Commission Staff Action (“Petition”), Hudson represents as follows:

I. Introduction and Background

1. Hudson is an EGS authorized by the Commission to provide electric generation supplier services to residential, small commercial, large commercial, industrial and governmental customers in all of the electric distribution company service territories within the Commonwealth of Pennsylvania. Hudson received its license to operate as an EGS by Commission Order of February 11, 2011 at Docket No. A-2010-2192137. As a licensed EGS, Hudson is subject to the Commission’s authority to require it to furnish a bond or other security in order to operate in the Commonwealth of Pennsylvania, pursuant to Section 2809(c) of the Public Utility Code (“Code”) and Section 54.40 of the Commission’s regulations. 66 Pa. C. S. §2809(c); 52 Pa. Code §54.40.

2. Section 54.40(d) of the Commission’s regulations requires EGSs to provide a security level of 10% of the licensee’s reported gross receipts. However, a licensee may seek

approval from the Commission of an alternative level of bonding, commensurate with the nature and scope of its operations. 52 Pa. Code §54.40(d). According to the Commission’s regulations, the purpose of the bond is to ensure payment of the Pennsylvania Gross Receipts Tax (“GRT”) and to ensure the supply of electricity at the retail level in accordance with contracts, agreements or arrangements. 52 Pa. Code §54.40(f)(2).

3. On July 24, 2014, after consideration of formal comments submitted to a December 5, 2013 Tentative Order, the Commission issued a final order concluding that, among other things, requiring an EGS to post a bond or security in the amount of 10% of gross receipts after the first year of operation “may be excessive in relation to the risk intended to be secured, unnecessarily burdening EGSs, and presenting a potential barrier to entry into Pennsylvania’s retail electric market.”¹ Therefore, the Commission in the July 24, 2014 Order adopted the policy of accepting applications by EGSs to reduce their level of bonding/security after the first year of operation to 5% of the EGS’s most recent 12 months of gross revenue or \$250,000, whichever is higher. In addition, the July 24, 2014 Order delegated authority to review uncontested requests for a reduction in the level of bonding to the Commission’s Bureau of Technical Utility Services.²

4. In an Order entered September 20, 2018, the Commission streamlined the process for EGSs to obtain reductions in their annual security obligations and permitted, *inter alia*, the filing of a Compliance Filing for renewal of security rather than a formal Petition.³

5. On September 20, 2021, Hudson filed a Compliance Filing with the Commission, requesting a renewal of its reduced security requirement of 5% of its most recent twelve (12)

¹ *Public Utility Commission Bonding/Security Requirements for Electric Generation Suppliers; Acceptable Security Instruments*, Docket No. M-2013-2393141 (July 24, 2014) at 10 (“July 24, 2014 Order”).

² July 24, 2014 Order at 12-13.

³ *Petition of the Retail Energy Supply Association to Simplify the Financial Security 5% Renewal Process*, Docket No. P-2017-2608078 (Order Entered September 20, 2018) at 17-20.

months of gross revenue. *See* Appendix 1. On the same day, two of Hudson’s affiliates, Just Energy Solutions Inc. (“JES”) and Just Energy Pennsylvania Corp. (“JEPC”) (collectively, the “Companies”), also filed requests for renewal of their reduced security requirement of 5% with the Commission at Docket No. A-110117 and Docket No. A-2009-2097544, respectively.⁴ Hudson requested that the same bond reduction renewal date of December 9, 2022 be set for all three Companies, as the Commission has set in the past, in order to streamline the process for the Commission and the Companies.

6. By Secretarial Letter dated October 1, 2021 (“Secretarial Letter”), Commission Staff denied Hudson’s request for a renewal of security reduction. *See* Appendix 2. Pursuant to Section 5.44 of the Commission’s regulations, 52 Pa. Code § 5.44, and the Secretarial Letter, Hudson’s Petition is timely, provided it is filed with the Commission within twenty (20) days of the Staff action, i.e. October 21, 2021.

7. The Commission’s Secretarial Letter denying Hudson’s request for renewal of a security reduction to 5% of the most recent twelve (12) months of gross revenues noted that on March 9, 2021 Hudson filed with the Commission a notice of its voluntary petition under Chapter 15 of the United States Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Proceeding”)⁵.

8. The Secretarial Letter went on to note that EGSs are required to provide financial security to the Commission “to ensure the financial responsibility of the electricity generation

⁴ Compliance filings for JES and JEPC for renewal of a reduction in security were also denied by Commission Staff via Commission Secretarial letters dated October 1, 2021. Petitions for Reconsideration of the Action of Commission Staff are being filed by JES and JEPC simultaneously with this Petition by Hudson. The basis for Commission Staff’s denial of the Compliance Filings and the basis for requesting reconsideration and granting of the Compliance Filings for Hudson, JES and JEPC are the same. Therefore, Hudson does not object to the Commission consolidating for disposition all three Petitions for the sake of administrative economy and efficiency, should the Commission so desire.

⁵ The Bankruptcy Proceeding, along with the Companies’ Creditors Arrangement Act filing in Canada, are collectively referred to herein as the “Bankruptcy Proceedings”).

supplier and the supply of electricity at retail in accordance with contracts, agreements or arrangements” and that because of the Bankruptcy Proceeding “we find considerable uncertainty regarding Hudson Energy Services’ ability to fulfil its future annual obligations under Section 2809” of the Code.⁶ Specifically, Commission Staff expressed concerns about Hudson’s ability to fulfil its obligations related to the GRT, the Alternative Energy Portfolio Standards Act (“AEPS Act”), and the Commission’s Annual Fee levied on EGSs.⁷

9. Because of these uncertainties regarding: (i) payment of the GRT, (ii) meeting AEPS Act requirements, and (iii) paying the Commission’s Annual Fee for regulatory expense, the Commission Staff asserted it was prudent to require Hudson to increase its current financial security level to 10% of its most recent four (4) quarters of revenue.⁸

II. Applicable Legal Standards

10. In determining whether to grant or deny reconsideration, the Commission applies the standard articulated in *Duick v. Pennsylvania Gas and Water Co.*, 56 Pa. P.U.C. 553 (1982):

A petition for reconsideration, under the provisions of 66 Pa. C.S. § 703(g), may properly raise any matters designed to convince the Commission that it should exercise its discretion under this code section to rescind or amend a prior order in whole or in part.

In this regard we agree with the court in the Pennsylvania Railroad Company case, wherein it was stated that:

Parties ... cannot be permitted by a second motion to review and reconsider, to raise the same questions which were specifically decided against them ... what we expect to see raised in petitions for reconsideration are new and novel arguments, not previously heard or considerations which appear to have been overlooked by the Commission.

Duick, 53 Pa. P.U.C. at 559.

⁶ 66 Pa. C.S. § 2809(c)(1)(i); Appendix 2 at 1.

⁷ *Id.*

⁸ *Id.*

11. Reconsideration of the Secretarial letter is appropriate because the denial of the renewal of Hudson's reduced security level was based only on Commission Staff's general uncertainty regarding the Company's ability to meet its GRT obligations, its AEPS Act obligations and its annual Commission assessment obligation during the twelve (12) month period beginning December 9, 2021. In this Petition, Hudson provides additional evidence, information and considerations, not previously considered by the Commission or Commission Staff, that will eliminate any uncertainty the Commission might have regarding Hudson's ability to meet these obligations. Through this Petition, the Affidavit of Michael Carter, Chief Financial Officer, Just Energy Group, Inc., and supporting materials, Hudson will show that (i) the protection and future relief from claims provided by the Bankruptcy Proceeding; (ii) the interim financing Hudson has in place; (iii) the Company's ability to continue to meet its financial obligations in the normal course; and (iv) potential legislative relief from some of the extraordinary costs that necessitated the Bankruptcy Proceeding in the form of new securitization funds, all combine to make unnecessary and unreasonable any increase in the Company's security costs in Pennsylvania. Granting this Petition will assist Hudson by eliminating additional financial costs, and such relief can be provided by the Commission without undue risk to the public interest.

III. Reasons Supporting Reconsideration

12. The Companies in the Bankruptcy Proceedings are referred to as the "Just Energy Entities." The Bankruptcy Proceedings were initiated due to significant losses and liquidity challenges for the Just Energy Entities that arose as a result of a catastrophic 2021 winter storm in Texas that caused extraordinary higher than normal customer demand, while forcing significant supply resources offline. These events forced the Just Energy Entities to balance customer energy demand through spot market purchases at artificially high electricity prices and increased ancillary

costs that led to significant losses. *See* Appendix 3, Affidavit of Michael Carter, Chief Financial Officer, Just Energy Group, Inc., pp. 1-2, ¶ 3. As of March 9, 2020, Hudson has been granted bankruptcy protection in Canada under the Companies’ Creditors Arrangement Act⁹ (“CCAA”) and in the United States pursuant to Chapter 15 of the Bankruptcy Code.¹⁰ The bankruptcy forums for the Bankruptcy Proceeding are the Ontario Superior Court of Justice in Canada and the United States Bankruptcy Court for the Southern District of Texas in the U.S. (collectively, the “Bankruptcy Authorities”). The Canadian proceeding has been granted recognition by the United States Bankruptcy Court for the Southern District of Texas as a “foreign main proceeding” pursuant to Chapter 15 of the Bankruptcy Code.¹¹

13. The Bankruptcy Proceedings are one of several bankruptcy proceedings that have been filed due to a cold weather phenomenon that occurred in Texas electricity markets in February 2021. As a result of this extraordinary and unprecedented weather event and the resulting temporary spikes in the cost of wholesale power, several of the Just Energy Entities received charges from Electric Reliability Council of Texas, Inc. (“ERCOT”)¹² that greatly exceeded their historic costs in the ERCOT market. The purpose of the Bankruptcy Proceedings is to allow a restructuring of the Just Energy Entities’ finances, while continuing normal operations under the

⁹ R.S.C., c. C-36, as amended.

¹⁰ Hudson is a subsidiary of Just Energy Group Inc., (“Just Energy”) a Canadian corporation and the lead entity in the Bankruptcy Proceeding. JES and JEPC are also part of the Bankruptcy Proceeding. Chapter 15 was added to the Bankruptcy Code by the Bankruptcy Abuse Prevention and Consumer Protection Act of 2005. It is the United States’ adoption of the Model Law on Cross-Border Insolvency promulgated by the United Nations Commission on International Trade Law in 1997, and it replaces former section 304 of the Bankruptcy Code.

The purpose of Chapter 15, and the Model Law on which it is based, is to provide effective mechanisms for dealing with insolvency cases involving debtors, assets, claimants, and other parties of interest involving more than one country. Generally, a chapter 15 case is ancillary to a primary proceeding brought in another country, typically the debtor’s home country.

¹¹ *Order Granting Petition for (I) Recognition as Foreign Main Proceedings, (II) Recognition of Foreign Representative, and (III) Related Relief Under Chapter 15 of the Bankruptcy Code*, Case No. 21-30823 (MI)(Order entered April 2, 2021).

¹² ERCOT operates Texas’ electrical grid, the Texas Interconnection, which supplies electric power to more than 25 million Texas customers and represents 90 percent of the state’s electric load.

protections offered by the CCAA. *See* Appendix 3, Affidavit of Michael Carter, Chief Financial Officer, Just Energy Group, Inc., p. 2, ¶ 4. As noted in Hudson’s March 9, 2021 notice to the Commission, Hudson is committed to continuing to meet its financial and regulatory obligations during the pendency of these proceedings. Hudson’s next Commission security renewal period will run from December 9, 2021 to December 8, 2022, which roughly approximates the 2022 calendar year.

14. On March 9, 2021, the Ontario Superior Court of Justice entered an Order approving debtor-in-possession financing for the Just Energy Entities in the principal amount of \$125 million (the “DIP Facility”). Hudson and the other Just Energy Entities have been able to operate their respective businesses in the normal course since the Bankruptcy Proceedings were filed with the assistance of the DIP Facility. These funds from the DIP Facility are allocated to the Just Energy Entities, including Hudson, JES and JEPC, as needed for operational and regulatory purposes. *See* Appendix 3, Affidavit of Michael Carter, Chief Financial Officer, Just Energy Group, Inc., p. 2, ¶ 5.

15. The Just Energy Entities Bankruptcy Proceedings Monitor, FTI Consulting Canada Inc., (the “Bankruptcy Monitor”), has submitted to the Ontario Superior Court of Justice as part of its September 8, 2021 Third Report (available at [http://cfcanada.fticonsulting.com/justenergy/docs/Third%20Report%20of%20the%20Monitor%20\(September%208%202021\)%20-%20vFINAL.pdf](http://cfcanada.fticonsulting.com/justenergy/docs/Third%20Report%20of%20the%20Monitor%20(September%208%202021)%20-%20vFINAL.pdf)), a cash flow forecast that indicates that for the period ending January 1, 2022, the Just Energy Entities will have \$76.6¹³ million in cash on hand that will enable them to continue to meet operational costs in the normal course of business. Such forecasts are based on reasonable assumptions regarding future events, although actual

¹³ \$96.6 million in Canadian dollars is cited in the Third Report, which is the equivalent of \$76.6 million U.S. dollars, using a 1.26 exchange rate.

variations in results may occur. The Just Energy Entities are [REDACTED]. See Appendix 3, Affidavit of Michael Carter, Chief Financial Officer, Just Energy Group, Inc., p. 3, ¶ 6.

16. On June 16, 2021, the Governor of Texas signed House Bill (“HB”) 4492, which provides a mechanism for the partial recovery of costs incurred by certain Texas energy market participants, including the Just Energy Entities, during the extraordinary Texas weather event in February 2021. HB 4492 addresses the securitization¹⁴ of (i) ancillary service charges above the system-wide offer cap of \$9,000/MWh during the weather event; (ii) reliability deployment price adders charged by ERCOT during the weather event; and (iii) non-payment of amounts due to defaults by competitive market participants that resulted in short (i.e., less than the full amount due) payments to market participants, including Just Energy. Consistent with the requirements of HB 4492, ERCOT requested that the Public Utility Commission of Texas (“Texas Commission”) establish securitization financing mechanisms for the payment of certain costs incurred by load-serving entities¹⁵, including Just Energy. The Texas Commission approved ERCOT’s application on October 13, 2021. The approved securitization mechanism provides an opportunity for partial financial recovery to the Just Energy Entities that will strengthen their financial position. The Just Energy Entities anticipate a recovery of at least [REDACTED] from the securitization. See Appendix 3, Affidavit of Michael Carter, Chief Financial Officer, Just Energy Group, Inc., pp. 3-4, ¶ 7.

17. The first specific issue of financial uncertainty raised by Commission Staff is the ability of Hudson to timely pay GRT due in the twelve months beginning December 9, 2021. For

¹⁴ Securitization is the process in which certain types of assets are pooled so that they can be repackaged into interest-bearing securities. The interest and principal payments from the assets are passed through to the purchasers of the securities.

¹⁵ A load serving entity (“LSE”) is the electric industry term for what is generally referred to as a utility or an electric company. In ERCOT, LSE’s are entities that register as an LSE with ERCOT and provide electric service to individual and wholesale customers. LSEs include Competitive Retailers (“CRs”) as well as Municipal Utilities and CO-OPs.

a given calendar year, GRT is paid by March 15 of that calendar year, with a subsequent true up payment of actual tax owed based on a reconciliation of estimated to actual gross revenues. Thus, the majority of the GRT payment is made by Hudson in March. Despite the Bankruptcy Proceedings initiated on March 9, 2021, Hudson paid its GRT requirements on March 15, 2021, demonstrating the Just Energy Entities' commitment to continue to make required payments to the tax and other regulatory authorities throughout the Bankruptcy Proceedings. *See* Appendix 3, Affidavit of Michael Carter, Chief Financial Officer, Just Energy Group, Inc., p. 4, ¶ 8.

18. As a result of all the actions discussed above that the Just Energy Entities have taken since the extraordinary weather event, the Just Energy Entities have stabilized the business and met all of their customer and regulatory obligations. This is reflected in the Bankruptcy Monitor's September 8, 2021 Third Report,¹⁶ which shows the cash flow forecast for the period ending January 1, 2022, projects the Just Energy Entities will have \$76.6 million in cash on hand, which will enable them to continue to meet operational costs in the normal and ordinary course of business, including the Hudson GRT payment due in March of 2022. This forecast of cash on hand does not include the potential of at least [REDACTED] in securitization funds expected under Texas HB 4492. Therefore adequate financial resources will be available to meet Hudson's 2022 GRT obligation. *See* Appendix 3, Affidavit of Michael Carter, Chief Financial Officer, Just Energy Group, Inc., p. 4, ¶ 9.

19. The second issue of potential financial uncertainty raised by Commission Staff concerns Hudson's ongoing ability to purchase appropriate amounts of alternative energy credits in order to satisfy its obligations under the AEPS Act. In its Compliance Filing requesting renewal of the security reduction, Hudson provided evidence from the Pennsylvania AEPS Administrator

¹⁶ The Third Report is the Bankruptcy Monitor's most recent Report.

that it had met its non-solar Tier I, solar Tier I and Tier II AEC retirement requirements (“AEPS Act Requirements”) for energy year 2021. *See* Appendix 1, Confidential Attachment 3, AEPS Compliance. Hudson has already procured its estimated AEPS Act Requirements for energy year 2022. *See* Appendix 3, Affidavit of Michael Carter, Chief Financial Officer, Just Energy Group, Inc., pp. 4-5, ¶ 10.

20. The AEPS Act energy year runs from June to the following May. The AEPS Act non-solar and solar credits Hudson has already procured for energy year 2022 approximate the historic number of credits the Company has purchased to satisfy its AEPS Act Requirements based on its typical annual level of electricity sales in Pennsylvania. The final number of Hudson’s AEPS Act Requirements for energy year 2022 cannot be confirmed until electricity sales for that same period have occurred. However, Hudson’s advance purchase of its “typical” AEPS Act Requirements has substantially reduced any uncertainty regarding whether it will be able to fulfill this financial requirement. *See* Appendix 3, Affidavit of Michael Carter, Chief Financial Officer, Just Energy Group, Inc., pp.4-5, ¶ 10. Thus, the Company has addressed the Commission Staff’s second financial concern.

21. The third issue of potential financial uncertainty raised by Commission Staff concerns Hudson’s ability to satisfy payment of the Commission annual regulatory fees. As indicated in its September 20, 2021 Compliance Filing, Hudson has paid both the minimum EGS fee due July 1 2021, as well as the fee due October 10, 2021 based on its reported Pennsylvania revenues. *See* Appendix 1; Appendix 4, Hudson Supplemental Compliance Filing, Supplemental Confidential Attachment 5, Proof of Payment of the Supplemental Assessment Fee. Both of these payments were made to the Commission timely, and in full, well after the Just Energy Entities’ Bankruptcy Proceedings commenced. Moreover, as a result of all the actions discussed above the

Just Energy Entities have taken since the extraordinary weather event, the Just Energy Entities have stabilized the business and met all of its customer and regulatory obligations. This is reflected in the Bankruptcy Monitor's September 8, 2021 Third Report.¹⁷ See Appendix 3, Affidavit of Michael Carter, Chief Financial Officer, Just Energy Group, Inc., p.4, ¶ 9.

22. As mentioned above and as shown in the Bankruptcy Monitor's September 8, 2021 Third Report, the cash flow forecast for the period ending January 1, 2022, projects the Just Energy Entities will have \$76.6 million in cash on hand, which will enable them to continue to meet operational costs in the normal and ordinary course of business. See Appendix 3, Affidavit of Michael Carter, Chief Financial Officer, Just Energy Group, Inc., p. 4, ¶ 9. The substantial financial liquidity that is being maintained by the Just Energy Entities is sufficient to address the Commission Staff's concerns regarding the ability of Hudson to satisfy payment of 2022 Commission fees.

23. The Just Energy Entities, including Hudson, expect to successfully emerge from the Bankruptcy Proceedings sometime in 2022. See Appendix 3, Affidavit of Michael Carter, Chief Financial Officer, Just Energy Group, Inc., p. 5, ¶ 11. Between now and the Just Energy Companies' emergence from bankruptcy, it is important that the Just Energy Companies do not incur unnecessary costs, which is one of the fundamental benefits and purpose of the Bankruptcy Proceedings.

24. The Commission is empowered with discretion to set security amounts for EGSs. It would be unreasonable for the Commission to exercise that discretion by *increasing* Hudson's required security costs above and beyond what has become the customary five percent (5%) amount, when the evidence supports Hudson's ability to fully pay and meet its GRT obligations,

¹⁷ The Third Report is the Bankruptcy Monitor's most recent Report.

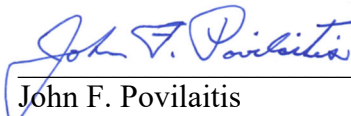
its AEPS Act compliance costs and the Commission's fees in the ordinary course of business. In this Petition, Hudson has presented sufficient evidence, not previously considered by Commission Staff, to justify continuation of its customary 5% security renewal filings.

IV. Conclusion and Relief Requested

WHEREFORE, based on the additional evidence, information and considerations not previously considered, but presented in this Petition, that eliminate any uncertainty the Commission might have regarding Hudson's ability to meet its financial obligations as an EGS in Pennsylvania, Hudson respectfully requests that the Commission grant this Petition for Reconsideration and approve renewal of its reduced security amount of five percent (5%) requested in its September 20, 2021 Compliance Filing, as supplemented on September 29, 2021.

Respectfully submitted,

Dated: October 21, 2021



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Appendix 1



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September 20, 2021

VIA E-FILING (PUBLIC VERSION) AND
OVERNIGHT DELIVERY (CONFIDENTIAL VERSION)

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

Re: Hudson Energy Services, LLC. Request for Renewal of a Reduction in Level of
Security, Docket No. A-2010-2192137
Utility Code: 1112538

Dear Secretary Chiavetta:

Enclosed is the Compliance Filing of Hudson Energy Services, LLC. ("Hudson"), a licensed energy generation supplier ("EGS"), to obtain renewal of its reduced 5% security requirement. This is a renewal of Hudson's previously granted security reduction, therefore no filing fee is enclosed.

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

Please note that we are filing the public version electronically on the Commission's website and the confidential version is being filed by overnight delivery.

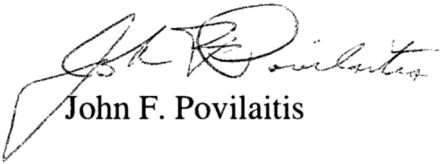
Copies of the Public Version of Hudson's Compliance Filing have been served on each of the statutory parties, the Commission's Bureau of Technical Utility Services, the Commonwealth of Pennsylvania's Department of Revenue, the Office of Attorney General's Bureau of Consumer

September 20, 2021
Page - 2 -

Protection and all affected Pennsylvania electric distribution companies, as indicated in the attached Certificate of Service.

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

Very truly yours,



John F. Povilaitis

JFP/tlg
Enclosures
cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Hudson Energy Services, LLC.	:	Docket No. A-2010-2192137
Request For Renewal of a Reduction	:	Utility Code: 1112538
in Level of Security	:	

HUDSON ENERGY SERVICES, LLC. COMPLIANCE FILING

I. Introduction

1. Hudson Energy Services, LLC. (“Hudson” or “Company”) is an electric generation supplier (“EGS”) authorized by the Pennsylvania Public Utility Commission (“PaPUC” or “Commission”) to provide electric generation supplier services to residential, small commercial, large commercial, industrial and governmental customers in the electric distribution company service territories within the Commonwealth of Pennsylvania. Hudson received its license to operate as an EGS by Order of February 11, 2011 at Docket No. A-2010-2192137. As a licensed EGS, Hudson is subject to the Commission’s authority to require it to furnish a bond or other security in order to operate in the Commonwealth of Pennsylvania, pursuant to Section 2809(c) of the Public Utility Code (“Code”) and Section 54.40 of the Commission’s regulations. 66 Pa.C. S. §2809(c); 52 Pa.Code §54.40.

2. Section 54.40(d) of the Commission’s regulations requires EGSs to provide a security level of 10% of the licensee’s reported gross receipts. However, a licensee may seek approval from the Commission of an alternative level of bonding, commensurate with the nature and scope of its operations. 52 Pa.Code §54.40(d). According to the Commission’s regulations, the purpose of the bond is to ensure payment of the Pennsylvania Gross Receipts Tax (“GRT”) and to ensure the supply of electricity at the retail level in accordance with contracts, agreements or arrangements. 52 Pa.Code §54.40(f)(2). On July 24, 2014, after consideration of formal

comments submitted to a December 5, 2013 Tentative Order, the Commission found that requiring an EGS to post a bond or security in the amount of 10% of gross receipts after the first year of operation “may be excessive in relation to the risk intended to be secured, unnecessarily burdening EGSs, and presenting a potential barrier to entry into Pennsylvania’s retail electric market.”¹ Therefore the Commission announced in the July 24, 2014 Order that it was adopting the policy of accepting applications by EGSs to reduce their level of bonding/security after the first year of operation to 5% of the EGS’s most recent 12 months of gross revenue or \$250,000, whichever is higher. In addition, the July 24, 2014 Order delegated authority to review uncontested requests for a reduction in the level of bonding to the Bureau of Technical Utility Services.² In an Order entered September 20, 2018, the Commission streamlined the process for EGSs to obtain reductions in their annual security obligations and permitted, *inter alia*, the filing of a Compliance Filing for renewal of security rather than a formal Petition.³

3. Based on the July 24, 2014 Order, the September 20, 2018 Order, the Code, the Commission’s regulation at Section 54.40(d) and the following supporting material, Hudson respectfully requests that the Commission accept a reduced security requirement of 5% of its most recent 12 months of gross revenue.

4. By Secretarial Letter Dated October 12, 2017 at Docket No. A-2010-2192137, Utility Code: 1112538, the Commission approved Hudson’s September 6, 2017 Petition for a security reduction, effective to December 9, 2018. This approval synchronized the Company’s twelve (2) month security reduction period with its annual security renewal period. Hudson

¹ *Public Utility Commission Bonding/Security Requirements for Electric Generation Suppliers; Acceptable Security Instruments*, Docket No. M-2013-2393141 (July 24, 2014) (“July 24, 2014 Order”) at 10.

² July 24, 2014 Order at 12-13.

³ *Petition of the Retail Energy Supply Association to Simplify the Financial Security 5% Renewal Process*, Docket No. P-2017-2608078 (Order Entered September 20, 2018) at 17-20.

respectfully requests that the Commission set its new bond reduction renewal date as December 9, 2022 for it and its two other affiliates - Just Energy Solutions Inc. (“JES”), Docket No. A-110117, and Just Energy Pennsylvania Corp. (“JEPC”), Docket No. A-2009-2097544 (collectively, the “Companies”). Security reduction renewal requests are being separately filed for JES and JEPC requesting the same security reduction periods and annual security renewal dates in order to streamline the entire process for the Commission and the Companies.

II. Information Provided in Support of Security Compliance Filing

5. This Compliance Filing includes Confidential Attachments 1 through 4. Confidential Attachment 1 provides Hudson’s gross revenues for the sale of electricity to retail customers in Pennsylvania for the most recent twelve (12) months.

6. Confidential Attachment 2 is a Tax Status Letter of Good Standing obtained by Hudson from the Pennsylvania Department of Revenue (“DOR”).

7. Confidential Attachment 3 documents Hudson’s full compliance with the requirements of the Alternative Energy Portfolio Standards (“AEPS”) Act.

8. Confidential Attachment 4 is a Department of Revenue RCT-SPEC Specialty Tax Payment Form for Hudson.

9. Confidential Attachment 5 is proof that Hudson has paid its current Annual Assessment fee to the PaPUC for regulatory costs. Proof of payment of the Supplemental Assessment fee due October 10, 2021 will be submitted when available.

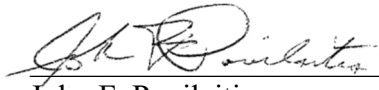
10. Based on the foregoing information, Hudson requests that its bonding requirement be maintained at 5% of its most recent twelve (12) months of gross revenue. This amount is reasonable and satisfies the requirements of Section 2809(c) of the Public Utility Code (“Code”) and Section 54.40 of the Commission’s regulations. 66 Pa.C. S. §2809(c); 52 Pa. Code §54.40.

An original security document will be submitted to the Commission when the final quarter of gross revenues is available.

III. Relief Requested and Conclusion

11. Based on its standing as an EGS licensed to do business in Pennsylvania, the Commission's regulations the July 24, 2014 Order and the September 18, 2020 Order, Hudson respectfully requests that it be authorized to renew its security on file with the Commission to 5% of its most recent twelve (12) months of revenue, effective for the twelve (12) month period to December 9, 2021. Hudson will submit a new bond in this amount that also complies with the Commission's bond requirements for EGSs listed in Section 55.40(f) of the Commission's regulations. 52 Pa.Code §54.40(f).

Respectfully submitted,



John F. Povilaitis
Buchanan Ingersoll & Rooney PC
409 North Second Street
Suite 500
Harrisburg, PA 17101
(717) 237-4825

Dated: September 20, 2021

Counsel for Hudson Energy Services, LLC.

Confidential Attachment 1

Gross revenues for the sale of electricity to retail customers in
Pennsylvania for the most recent nine (9) months

(REDACTED)

Confidential Attachment 2

Letter of Good Standing

(REDACTED)

Confidential Attachment 3

AEPS Compliance

(REDACTED)

Confidential Attachment 4

RCT-SPEC Specialty Tax Payment Form

(REDACTED)

Confidential Attachment 5

Proof of Payment - EGS Annual Fee

(REDACTED)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Hudson Energy Services, LLC.	:	Docket No. A-2010-2192137
Request For Renewal of a Reduction	:	Utility Code: 1112538
in Level of Security	:	

CERTIFICATE OF SERVICE

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

Via First Class Mail

Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

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

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

Bureau of Technical Utility Services
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
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Department of Revenue
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Attn: EGS Coordination
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Lewisburg, PA 17837

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

Legal Department
First Energy
2800 Pottsville Pike
Reading, PA 19612

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

PUBLIC VERSION

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

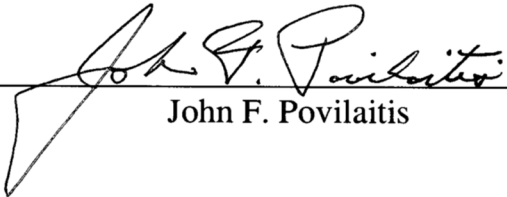
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PECO Energy Company
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Philadelphia, PA 19101-8699

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Attn: Kimberly Klock
PPL
Two North Ninth Street
Allentown, PA 18108-1179

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

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

Dated this 20th day of September, 2021.



John F. Povilaitis

Appendix 2



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
400 NORTH STREET, HARRISBURG, PA 17120

IN REPLY
PLEASE REFER
TO OUR FILE

October 1, 2021

Docket No. A-2010-2192137
Utility Code: 1112538

EMAIL

JOHN F POVILAITIS
BUCHANAN INGERSOLL & ROONEY PC
409 NORTH SECOND STREET STE 500
HARRISBURG PA 17101

Re: Bonding/Security Reduction for Electric Generation Supplier Hudson Energy Services, LLC

Dear Mr. Povilaitis:

On September 20, 2021, Hudson Energy Services LLC (Hudson Energy Services) filed a 5% Annual Compliance Filing with the Commission for permission to maintain its Electric Generation Supplier financial security level of 5% of its most recent four quarters of revenue.

Hudson Energy Services filed the 5% Annual Compliance Filing pursuant to the Commission's Order entered September 20, 2018, at Docket No. P-2017-2608078.

On March 9, 2021, Hudson Energy Services filed notice with the Commission of its voluntary petition under Chapter 15 of the United States Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Texas (Bankruptcy Proceeding).

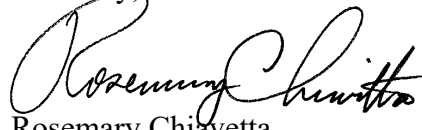
The financial security is designed "to ensure the financial responsibility of the electricity generation supplier and the supply of electricity at retail in accordance with contracts, agreements or arrangements¹." Because of the ongoing Bankruptcy Proceeding, we find considerable uncertainty regarding Hudson Energy Services' ability to fulfil its future annual obligations under Section 2809. In particular, we have concerns regarding Hudson Energy Services' ability to fulfil its obligations related to gross receipts taxes, Alternate Energy Portfolio Standards (AEPS) and the Commission's Annual Fee levied on EGSs. Because of these uncertainties, we believe that it is prudent to require Hudson Energy Services to increase its current financial security level to 10% of its most recent four quarters of revenue.

Therefore, for the reasons stated above, Hudson Energy Services' 5% Annual Compliance Filing is hereby **denied**.

¹ 66 Pa. C.S. Section 2809(c)(1)(i)

In accordance with 52 Pa. Code 5.44, this staff action will be deemed to be the final action of the Commission unless a petition of reconsideration is filed with the Secretary of the Commission within 20 days of the date on this notice.

Sincerely,

A handwritten signature in black ink, appearing to read "Rosemary Chiavetta". The signature is fluid and cursive, with a large initial "R" and a stylized "C".

Rosemary Chiavetta
Secretary

Appendix 3

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**AFFIDAVIT OF MICHAEL CARTER,
CHIEF FINANCIAL OFFICER, JUST ENERGY GROUP, INC.**

I, Michael Carter, being duly sworn according to law, depose and say that I am authorized to make this affidavit on behalf of Just Energy Group Inc. (“JEGI”), being their Chief Financial Officer, and the facts set forth are true and correct to the best of my knowledge, information and belief, and I expect to be able to prove the same at any hearing hereof, attest as follows:

1. My name is Michael Carter. My business address is 5251 Westheimer Road, Suite 1000, Houston, Texas.
2. I am employed by Just Energy (U.S.) Corp. (“Just Energy”), an indirect subsidiary of JEGI, as its Chief Financial Officer and have been appointed as the Chief Financial Officer of the Just Energy Entities (defined below), including Hudson Energy Services LLC (“Hudson”), Just Energy Solutions, Inc. (“JES”) and Just Energy Pennsylvania Corp (“JEPC”). I have been employed by Just Energy since September 28, 2020, and have held my current position since that date.
3. On March 9, 2021 Hudson, JES and JEPC filed with the Commission a notice of its voluntary petition under Chapter 15 of the United States Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Proceeding”).¹ Hudson, JES and JEPC are subsidiaries of JEGI, a Canadian corporation and the lead entity in the Bankruptcy Proceedings. The debtor companies involved in the Bankruptcy Proceedings are referred to as the Just Energy Entities. The Bankruptcy Proceedings were initiated due to significant losses and liquidity challenges for the Just

¹ The Bankruptcy Proceeding, along with a separate proceeding filed in Canada seeking the protections offered by the Canadian Creditors Arrangement Act (“CCAA”), are collectively referred to herein as the “Bankruptcy Proceedings.”

Energy Entities that arose as a result of a catastrophic 2021 winter storm in Texas that caused extraordinary higher than normal customer energy demand, while forcing significant power supply resources offline. These events forced the Just Energy Entities to balance customer energy demand through spot market purchases at artificially high electricity prices and increased ancillary costs that led to significant losses.

4. The Bankruptcy Proceedings are one of several bankruptcy proceedings that have been filed due to a cold weather phenomenon that occurred in Texas electricity markets in February 2021. As a result of this extraordinary and unprecedented weather event and the resulting temporary spikes in the cost of wholesale power, several of the Just Energy Entities received charges from Electric Reliability Council of Texas, Inc. (“ERCOT”)² that greatly exceeded their historic costs in the ERCOT market. The purpose of the Bankruptcy Proceedings is to allow a restructuring of the Just Energy Entities’ finances, while continuing normal operations under the protections offered by the CCAA.
5. On March 9, 2021, the Ontario Superior Court of Justice entered an Order approving debtor-in-possession financing for the Just Energy Entities in the principal amount of \$125 million (the “DIP Facility”). Hudson, JES, JEPC and the other Just Energy Entities have been able to operate their respective businesses in the normal course with the assistance of the DIP Facility since the Bankruptcy Proceedings were filed. The funds from the DIP Facility are allocated to the Just Energy Entities, including Hudson, JES and JEPC, as needed for operational and regulatory purposes.
6. The Just Energy Entities’ Bankruptcy Proceedings Monitor, FTI Consulting Canada Inc., (the “Bankruptcy Monitor”), has submitted to the Ontario Superior Court of Justice as part

²ERCOT operates Texas' electrical grid, the Texas Interconnection, which supplies electric power to more than 25 million Texas customers and represents 90 percent of the state's electric load.

of its September 8, 2021 Third Report (available at [http://cfcanada.fticonsulting.com/justenergy/docs/Third%20Report%20of%20the%20Monitor%20\(September%20-%202021\)%20-%20vFINAL.pdf](http://cfcanada.fticonsulting.com/justenergy/docs/Third%20Report%20of%20the%20Monitor%20(September%20-%202021)%20-%20vFINAL.pdf)), a cash flow forecast that indicates that for the period ending January 1, 2022, the Just Energy Entities will have \$76.6 million³ in cash on hand that will enable them to continue to meet operational costs in the normal course of business. Such forecasts are based on reasonable assumptions regarding future events, although actual variations in results may occur. The Just Energy Entities are [REDACTED].

7. On June 16, 2021, the Governor of Texas signed House Bill (“HB”) 4492, which provides a mechanism for the partial recovery of costs incurred by certain Texas energy market participants, including the Just Energy Entities, during the extraordinary Texas weather event in February 2021. HB 4492 addresses the securitization⁴ of (i) ancillary service charges above the system-wide offer cap of \$9,000/MWh during the weather event; (ii) reliability deployment price adders charged by ERCOT during the weather event; and (iii) non-payment of amounts due to defaults by competitive market participants that resulted in short (i.e., less than the full amount due) payments to market participants, including Just Energy. Consistent with the requirements of HB 4492, ERCOT requested that the Public Utility Commission of Texas (“Texas Commission”) establish securitization financing mechanisms for the payment of certain costs incurred by load-serving entities⁵, including

³ \$96.6 million in Canadian dollars is cited in the Third Report, which is the equivalent of \$76.6 million U.S. dollars, using a 1.26 exchange rate.

⁴ Securitization is the process in which certain types of assets are pooled so that they can be repackaged into interest-bearing securities. The interest and principal payments from the assets are passed through to the purchasers of the securities.

⁵ A load serving entity (“LSE”) is the electric industry term for what is generally referred to as a utility or an electric company. In ERCOT, LSE’s are entities that register as an LSE with ERCOT and provide electric service to individual and wholesale customers. LSEs include Competitive Retailers (“CRs”) as well as Municipal Utilities and COOPs.

Just Energy. The Texas Commission approved ERCOT's application on October 13, 2021. The approved securitization mechanism provides an opportunity for partial financial recovery to the Just Energy Entities that will strengthen their financial position. Just Energy anticipates a recovery of at least [REDACTED] from the securitization.

8. For a given calendar year, Pennsylvania Gross Receipts Tax ("GRT") is paid by March 15 of that calendar year, with a subsequent true up payment of actual tax owed based on a reconciliation of estimated to actual gross revenues. Most of the GRT payment is made by Hudson, JES and JEPC in March. Despite initiating the Bankruptcy Proceedings on March 9, 2021, Hudson, JES and JEPC paid their respective GRT requirements on March 15, 2021.
9. As a result of all the actions discussed above that the Just Energy Entities have taken since the extraordinary weather event, the Just Energy Entities have stabilized the business and met all of their customer and regulatory obligations. This is reflected in the Bankruptcy Monitor's September 8, 2021 Third Report,⁶ which shows the cash flow forecast for the period ending January 1, 2022, projects the Just Energy Entities will have \$76.6 million in cash on hand, which will enable them to continue to meet operational costs in the normal and ordinary course of business, including the GRT payments due in March of 2022. This forecast of cash on hand does not include the potential of at least [REDACTED] in securitization funds expected under HB 4492. Therefore, adequate financial resources will be available to meet Hudson's, JES's and JEPC's 2022 GRT obligations.
10. Hudson, JES and JEPC have already procured their estimated AEPS Act Requirements for energy year 2022. The AEPS Act non-solar and solar credits Hudson, JES and JEPC have

⁶ The Third Report is the Bankruptcy Monitor's most recent Report.

already procured for energy year 2022 approximate the historic number of credits these Companies have purchased to satisfy their AEPS Act Requirements based on their typical annual level of electricity sales in Pennsylvania. The final number of Hudson's, JES's and JEPC's AEPS Act Requirements for energy year 2022 cannot be confirmed until electricity sales for that same period have occurred. Hudson's, JES's and JEPC's advance purchases of their "typical" AEPS Act Requirements have substantially reduced any uncertainty regarding whether they will be able to fulfill this financial requirement.

11. The Just Energy Entities, including Hudson, JES and JEPC, expect to successfully emerge from the Bankruptcy Proceedings sometime in 2022.



Michael Carter
Chief Financial Officer
Just Energy Group, Inc.

VERIFICATION

I, Michael Carter, hereby verify that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief, and expect to be able to prove the same at any hearing that may be held in this matter. I understand that false statements made therein are made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsifications to authorities.

A handwritten signature in black ink, appearing to read "Michael Carter", is positioned above a horizontal line.

Michael Carter
Chief Financial Officer
Just Energy Group, Inc.

DATED: October 21, 2021

Appendix 4

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

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

September 29, 2021

VIA E-FILING (PUBLIC VERSION) AND
OVERNIGHT DELIVERY (CONFIDENTIAL VERSION)

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

Re: Hudson Energy Services, LLC. Request For Renewal of a Reduction In Level of
Security; Docket No. A-2010-2192137

Dear Secretary Chiavetta:

On September 20, 2021, Hudson Energy Services, LLC. (“Hudson”), a licensed energy generation supplier (“EGS”), filed its Compliance Filing with the Pennsylvania Public Utility Commission (“PaPUC”) to obtain renewal of its reduced 5% security requirement. Enclosed for filing today, please find Hudson’s Supplemental Compliance Filing which includes proof of payment of the Supplemental Assessment fee due October 10, 2021 (Supplemental Confidential Attachment 5).

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

Please note that we are filing the public version electronically on the Commission’s website and the confidential version is being filed by overnight delivery.

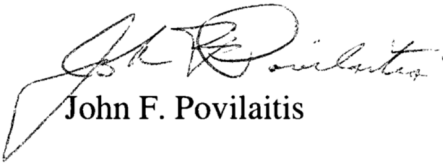
Copies of the Public Version of Hudson’s Compliance Filing have been served on each of the statutory parties, the Commission’s Bureau of Technical Utility Services, the Commonwealth of Pennsylvania’s Department of Revenue, the Office of Attorney General’s Bureau of Consumer

September 29, 2021
Page - 2 -

Protection and all affected Pennsylvania electric distribution companies, as indicated in the attached Certificate of Service.

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

Very truly yours,



John F. Povilaitis

JFP/tlg
Enclosures
cc: Certificate of Service

Supplemental Confidential Attachment 5

Proof of Payment of the Supplemental Assessment fee

(REDACTED)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Hudson Energy Services, LLC.	:	Docket No. A-2010-2192137
Request For Renewal of a Reduction	:	Utility Code: 1112538
in Level of Security	:	

CERTIFICATE OF SERVICE

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

Via First Class Mail

Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

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

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

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

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

Commonwealth of Pennsylvania
Department of Revenue
Bureau of Compliance
PO Box 280947
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Citizens' Electric Company
Attn: EGS Coordination
1775 Industrial Boulevard
Lewisburg, PA 17837

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

Legal Department
First Energy
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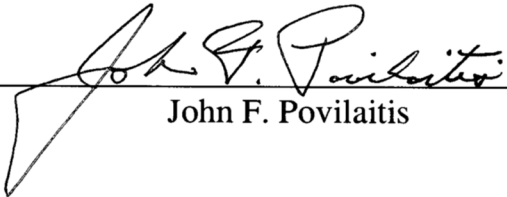
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PECO Energy Company
2301 Market Street
Philadelphia, PA 19101-8699

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

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

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

Dated this 29th day of September, 2021.



John F. Povilaitis

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Hudson Energy Services, LLC.	:	Docket No. A-2010-2192137
Request For Renewal of a Reduction	:	Utility Code: 1112538
in Level of Security	:	

CERTIFICATE OF SERVICE

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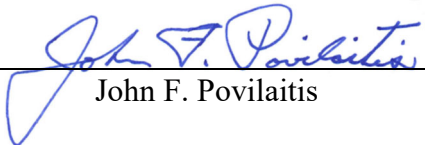
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Manager Energy Acquisition
PECO Energy Company
2301 Market Street
Philadelphia, PA 19101-8699

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

Dated this 21st day of October, 2021.



John F. Povilaitis