

# Buchanan

Ingersoll · Rooney

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November 9, 2021

## VIA E-FILING

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

Re: Just Energy Solutions Inc. d/b/a Just Energy Request for Renewal of a Reduction  
in Level of Security; Docket No. A-110117, Utility Code: 110117

Dear Secretary Chiavetta:

The purpose of this correspondence is to bring to the Pennsylvania Public Utility Commission's ("Commission") attention the need for expedited resolution of the Petition of Just Energy Solutions Inc. for Reconsideration of Pennsylvania Public Utility Commission Staff Action ("Petition for Reconsideration"), filed at the above-captioned Docket on October 21, 2021. Just Energy Solutions Inc. ("JES") is an active Pennsylvania electric generation supplier ("EGS") whose financial security on file with the Commission is due for renewal on December 9, 2021. JES's Petition for Reconsideration seeks review of the Commission Staff's October 1, 2021 denial of JES's request for renewal of its reduced level of security.

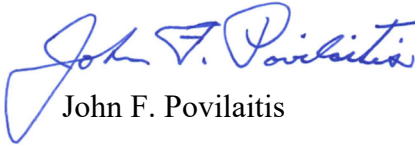
The Commission Public Meeting schedule indicates that the Public Meetings currently scheduled prior to the expiration of JES's current approved security level will occur on November 18, 2021 and December 2, 2021. If Commission action on the Petition for Reconsideration does not occur until December 2, 2021, timely submission of the correct security amount to the Commission to ensure continuous security coverage of JES's operations could be jeopardized due to the lead time needed to obtain security instruments.

JES respectfully requests Commission action, by any lawful means, on its Petition for Reconsideration at least ten (10) days prior to its security renewal date of December 9, 2021 so that its required security amount has been established by Commission action in sufficient time to allow preparation and timely submission of the correct security instrument. Toward that end, JES notes that at this time, its Petition for Reconsideration is an uncontested request.

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Thank you for your consideration of this request.

Very truly yours,



John F. Povilaitis

cc: Certificate of Service  
Kathryn G. Sophy, Director, Office of Special Assistants  
Gladys Brown Dutrieuille, Chairman  
John F. Coleman, Jr., Vice Chairman  
Ralph V. Yanora, Commissioner

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Just Energy Solutions, Inc. d/b/a : Docket No. A-110117  
Just Energy Request for Renewal of a : Utility Code: 110117  
Reduction in Level of Security :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy 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, 1<sup>st</sup> Floor  
Harrisburg, PA 17101

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

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

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

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

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

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

Legal Department  
First Energy  
2800 Pottsville Pike  
Reading, PA 19612

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

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

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

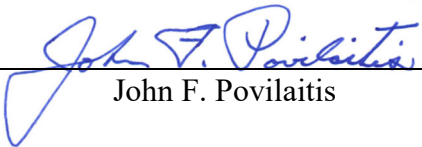
Manager Energy Acquisition  
PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19101-8699

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

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

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

Dated this 9th day of November, 2021.

  
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John F. Povilaitis