

# Buchanan

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August 28, 2025

**VIA E-FILING (PUBLIC VERSION) AND  
HAND-DELIVERED (CONFIDENTIAL VERSION)**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor Harrisburg, PA 17120

Re: Just Energy Pennsylvania Corp.; Security Renewal Compliance  
Filing Docket No. A-2009-2097544  
Utility Code: 1110954

Dear Secretary Homsher:

Enclosed for filing is the Security Renewal Compliance Filing of Just Energy Pennsylvania Corp. (“JEPC”), a licensed energy generation supplier (“EGS”).

The Compliance Filing includes commercially valuable and sensitive information for which JEPC requests confidential treatment. Accordingly, a version of the Compliance Filing marked “Public Version” for inclusion in the public record is being E Filed, and a version of the Compliance Filing marked “Confidential Version” is being hand-delivered to the Pennsylvania Public Utility Commission (“Commission”) today. **JEPC respectfully requests that the Confidential Version of its Compliance Filing be maintained by the Pennsylvania Public Utility Commission under seal.**

**Please note that the original of the renewed security is included in the Confidential Version of this filing that will be hand-delivered today to the Commission. Proof of payment of the Commission’s supplemental assessment fee will be submitted after the fee is invoiced later this year and paid.**

**PUBLIC VERSION**

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

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/psm  
Enclosures

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Just Energy Pennsylvania Corp. : Docket No. A-2009-2097544  
Security Compliance Filing : Utility Code: 1110954

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**JUST ENERGY PENNSYLVANIA CORP. COMPLIANCE FILING**

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**I. Introduction**

1. Just Energy Pennsylvania Corp. (“JEPC” 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. JEPC received its initial license to operate as an EGS in the service territory of Duquesne Light Company by Order of December 23, 2009 at Docket No. A-2009-2097544. By Order of June 21, 2012, JEPC obtained authority to operate as an EGS in all electric distribution company service territories in the Commonwealth of Pennsylvania at Docket No. A-2009-2097544. As a licensed EGS, JEPC 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

## PUBLIC VERSION

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.”<sup>1</sup> 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.<sup>2</sup> 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.<sup>3</sup>

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, JEPC respectfully requests that the Commission accept and approve its annual security compliance filing.

4. By Secretarial Letter Dated June 14, 2023 at Docket No. A-2009-2097544, Utility Code 1110954, the Commission approved JEPC’s February 24, 2023 Petition for a security reduction, effective to November 30, 2023. The Company requests renewal of the security

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<sup>1</sup> *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.

<sup>2</sup> July 24, 2014 Order at 12-13.

<sup>3</sup> *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.

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reduction and has provided the information to support an extension of the security reduction in this filing. Similar compliance filings are being made for JEPC's two other affiliates - Hudson Energy Services, LLC. ("Hudson"), Docket No. A-2010-2192137, and Just Energy Solutions Inc. ("JES"), Docket No. A-110117 (collectively, the "Companies").

### **II. Information Provided in Support of Security Compliance Filing**

5. This Compliance Filing includes Confidential Attachments 1 through 6.
6. Confidential Attachment 1 provides JEPC's gross revenues for the sale of electricity to retail customers in Pennsylvania for the most recent twelve (12) months and a calculation of 5% of those reported gross revenues.
7. Confidential Attachment 2 is a Tax Status Letter of Good Standing obtained by JEPC from the Pennsylvania Department of Revenue.
8. Confidential Attachment 3 provides confirmation of JEPC's paid gross receipts tax.
9. Confidential Attachment 4 is confirmation of AEPS Act compliance.
10. Confidential Attachment 5 is confirmation of payment of commission assessment fees.
11. Confidential Attachment 6 is a copy of JEPC's renewed security. An original security document will be delivered under separate cover to the Commission.
12. Based on the foregoing information, JEPC proposes to meet its security renewal requirement with security reflecting 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 and Section 54.40 of the Commission's regulations. 66 Pa.C.S. §2809(c); 52 Pa. Code §54.40.

III. **Relief Requested and Conclusion**

JEPC respectfully requests that its Compliance Filing be accepted and approved.

Respectfully submitted,



Dated: August 28, 2025

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

*Counsel for Just Energy Pennsylvania Corp.*

# Confidential Attachment 1

Gross revenues for the sale of electricity to retail customers in  
Pennsylvania for the most recent twelve (12) months

(July 2024 to June 2025)  
(REDACTED)

Confidential Attachment 2  
Tax Status Letter of Good Standing  
(REDACTED)

# Confidential Attachment 3

## Gross Receipts Tax

(REDACTED)

Confidential Attachment 4  
AEPS Act Compliance  
(REDACTED)

Confidential Attachment 5  
Commission Assessment Fee Payment Proof  
(REDACTED)

# Confidential Attachment 6

## Renewed Security

(REDACTED)

**VERIFICATION**

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

Signature: \_\_\_\_\_



Just Energy Pennsylvania Corp.

Title: Manager,  
Regulatory Affairs

Date: August 28, 2025

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Just Energy Pennsylvania Corp. : Docket No. A- 2009-2097544  
Security Compliance Filing : Utility Code: 1110954

**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 15219

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

**PUBLIC VERSION**

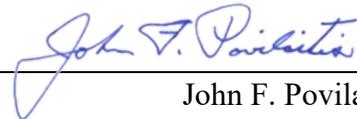
Legal Department  
West Penn Power Company  
800 Cabin Hill Drive  
Greensburg, PA 15601-1689

Office of General Counsel  
Attn: Kimberly Klock PPL  
Two North Ninth Street  
Allentown, PA 18108-1179  
UGI Utilities, Inc.  
Attn: Rates Dept. – Choice Coordinator  
1 UGI Drive  
Denver, PA 17517

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 28th day of August 2025.



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John F. Povilaitis