

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985,
c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF JUST ENERGY GROUP INC., JUST ENERGY CORP., ONTARIO ENERGY COMMODITIES INC., UNIVERSAL ENERGY CORPORATION, JUST ENERGY FINANCE CANADA ULC, HUDSON ENERGY CANADA CORP., JUST MANAGEMENT CORP., 11929747 CANADA INC., 12175592 CANADA INC., JE SERVICES HOLDCO I INC., JE SERVICES HOLDCO II INC., 8704104 CANADA INC., JUST ENERGY ADVANCED SOLUTIONS CORP., JUST ENERGY (U.S.) CORP., JUST ENERGY ILLINOIS CORP., JUST ENERGY INDIANA CORP., JUST ENERGY MASSACHUSETTS CORP., JUST ENERGY NEW YORK CORP., JUST ENERGY TEXAS I CORP., JUST ENERGY, LLC, JUST ENERGY PENNSYLVANIA CORP., JUST ENERGY MICHIGAN CORP., JUST ENERGY SOLUTIONS INC., HUDSON ENERGY SERVICES LLC, HUDSON ENERGY CORP., INTERACTIVE ENERGY GROUP LLC, HUDSON PARENT HOLDINGS LLC, DRAG MARKETING LLC, JUST ENERGY ADVANCED SOLUTIONS LLC, FULCRUM RETAIL ENERGY LLC, FULCRUM RETAIL HOLDINGS LLC, TARA ENERGY, LLC, JUST ENERGY MARKETING CORP., JUST ENERGY CONNECTICUT CORP., JUST ENERGY LIMITED, JUST SOLAR HOLDINGS CORP. AND JUST ENERGY (FINANCE) HUNGARY ZRT.

Applicants

**MOTION RECORD OF THE APPLICANTS
(Motion for Stay Extension)**

April 14, 2022

OSLER, HOSKIN & HARCOURT LLP

100 King Street West
1 First Canadian Place
Suite 6200, P.O. Box 50
Toronto ON M5X 1B8

Marc Wasserman (LSO# 44066M)
Tel: 416.862.4908
Email: mwasserman@osler.com

Michael De Lellis (LSO# 48038U)
Tel: 416.862.5997
Email: mdelellis@osler.com

Jeremy Dacks (LSO# 41851R)
Tel: 416.862.4923
Email: jdacks@osler.com

Lawyers to the Applicants

TO: SERVICE LIST

ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF **JUST ENERGY GROUP INC.**, JUST ENERGY CORP., ONTARIO ENERGY COMMODITIES INC., UNIVERSAL ENERGY CORPORATION, JUST ENERGY FINANCE CANADA ULC, HUDSON ENERGY CANADA CORP., JUST MANAGEMENT CORP., JUST ENERGY FINANCE HOLDING INC., 11929747 CANADA INC., 12175592 CANADA INC., JE SERVICES HOLDCO I INC., JE SERVICES HOLDCO II INC., 8704104 CANADA INC., JUST ENERGY ADVANCED SOLUTIONS CORP., JUST ENERGY (U.S.) CORP., JUST ENERGY ILLINOIS CORP., JUST ENERGY INDIANA CORP., JUST ENERGY MASSACHUSETTS CORP., JUST ENERGY NEW YORK CORP., JUST ENERGY TEXAS I CORP., JUST ENERGY, LLC, JUST ENERGY PENNSYLVANIA CORP., JUST ENERGY MICHIGAN CORP., JUST ENERGY SOLUTIONS INC., HUDSON ENERGY SERVICES LLC, HUDSON ENERGY CORP., INTERACTIVE ENERGY GROUP LLC, HUDSON PARENT HOLDINGS LLC, DRAG MARKETING LLC, JUST ENERGY ADVANCED SOLUTIONS LLC, FULCRUM RETAIL ENERGY LLC, FULCRUM RETAIL HOLDINGS LLC, TARA ENERGY, LLC, JUST ENERGY MARKETING CORP., JUST ENERGY CONNECTICUT CORP., JUST ENERGY LIMITED, JUST SOLAR HOLDINGS CORP. AND JUST ENERGY (FINANCE) HUNGARY ZRT.

(each, an “**Applicant**”, and collectively, the “**Applicants**”)

SERVICE LIST

(as at April 8, 2022)

<u>PARTY</u>	<u>CONTACT</u>
<p>OSLER, HOSKIN & HARCOURT LLP Box 50, 1 First Canadian Place 100 King Street West, Suite 6200 Toronto, ON M5X 1B8</p> <p>Fax: 416.862.6666</p> <p>Counsel to the Applicants</p>	<p>Marc Wasserman Tel: 416.862.4908 Email: MWasserman@osler.com</p> <p>Michael De Lellis Tel: 416.862.5997 Email: MDeLellis@osler.com</p> <p>Jeremy Dacks Tel: 416.862.4923 Email: JDacks@osler.com</p> <p>Shawn Irving Tel: 416.862.4733 Email: SIrving@osler.com</p> <p>Dave Rosenblat Tel: 416.862.5673 Email: DRosenblat@osler.com</p>
<p>JUST ENERGY GROUP INC. 100 King Street West, Suite 2630 Toronto, ON M5X 1E1</p> <p>Applicant</p>	<p>Jonah T. Davids EVP, General Counsel and Corporate Secretary Tel: 416.367.2574 Email: JDavids@justenergy.com</p> <p>Michael Carter Chief Financial Officer Email: mcarter@justenergy.com</p>
<p>KIRKLAND & ELLIS LLP 601 Lexington Avenue New York, NY 10022</p> <p>Fax: 212.446.4900</p> <p>609 Main St, Houston TX 77002, United States</p> <p>Fax: 713.836.3601</p> <p>U.S. Counsel to the Applicants</p>	<p>Brian Schartz Tel: 212.446.5932 / 713.836.3755 Email: brian.schartz@kirkland.com</p> <p>Mary Kogut Brawley Tel: 713.836.3650 Email: mary.kogut@kirkland.com</p> <p>Neil Herman Tel: 212.446.4522 Email: neil.herman@kirkland.com</p>

<p>FTI CONSULTING CANADA INC. P.O. Box 104, TD South Tower 79 Wellington Street West Toronto Dominion Centre, Suite 2010 Toronto, ON, M5K 1G8</p> <p>Fax: 416.649.8101</p> <p>Monitor</p>	<p>Paul Bishop Tel: 416.649.8053 Email: paul.bishop@fticonsulting.com</p> <p>Jim Robinson Tel: 416.649.8070 Email: jim.robinson@fticonsulting.com</p>
<p>THORNTON GROUT FINNIGAN LLP 100 Wellington St W, Suite 3200 Toronto, ON M5K 1K7</p> <p>Fax: 416.304.1313</p> <p>Counsel to the Monitor</p>	<p>Robert Thornton Tel: 416.304.0560 Email: rthornton@tgf.ca</p> <p>Rebecca Kennedy Tel: 416.304.0603 Email: rkennedy@tgf.ca</p> <p>Rachel Nicholson Tel: 416.304.1153 Email: rnicholson@tgf.ca</p> <p>Puya Fesharaki Tel: 416.304.7979 Email: pfesharaki@tgf.ca</p>
<p>PORTER HEDGES LLP 1000 Main St, 36th Floor Houston, TX 77002</p> <p>Fax: 713.226.6248</p> <p>U.S. Counsel to the Monitor</p>	<p>John F. Higgins Tel: 713.226.6648 Email: JHiggins@porterhedges.com</p>

CASSELS BROCK & BLACKWELL LLP

Scotia Plaza, Suite 2100,
40 King St W
Toronto, ON M5H 3C2

Fax: 416.360.8877

Canadian Counsel to the DIP Lenders

Ryan Jacobs

Tel: 416.860.6465

Email: rjacobs@cassels.com

Jane Dietrich

Tel: 416.860.5223

Email: jdietrich@cassels.com

Michael Wunder

Tel: 416.860.6484

Email: mwunder@cassels.com

Joseph Bellissimo

Tel: 416.860.6572

Email: jbellissimo@cassels.com

Alan Merskey

Tel: 416.860.2948

Email: amerskey@cassels.com

John M. Picone

Tel: 416.640.6041

Email: jpicone@cassels.com

Christopher Selby

Tel: 416.860.6737

Email: cselby@cassels.com

Jeremy Bornstein

Tel: 416.869.5386

Email: jbornstein@cassels.com

<p>AKIN GUMP STRAUSS HAUER & FELD LLP Bank of America Tower, 1 Bryant Park New York, NY 10036</p> <p>Fax: 212.872.1002</p> <p>111 Louisiana Street, 44th Floor Houston, TX 77002-5200</p> <p>Fax: 713.236.0822</p> <p>U.S. Counsel to the DIP Lenders</p>	<p>David Botter Tel: 212.872.1055 Email: dbotter@akingump.com</p> <p>Abid Qureshi Tel: 212.872.8027 Email: aqureshi@akingump.com</p> <p>Zach Wittenberg Tel: 212.872.1081 Email: zwittenberg@akingump.com</p> <p>Chad Nichols Tel: 713.250.2178 Email: cnichols@akingump.com</p> <p>Anthony Loring Tel: 212.872.1094 Email: aloring@akingump.com</p>
<p>HOLLAND & KNIGHT LLP 150 N. Riverside Plaza, Suite 2700 Chicago, IL 60606</p> <p>Fax: 312.578.6666</p> <p>Counsel to the DIP Agent</p>	<p>Daniel Sylvester Tel: 312.715.5880 Email: daniel.sylvester@hklaw.com</p> <p>Phillip Nelson Tel: 312.578.6584 Email: phillip.nelson@hklaw.com</p>
<p>MCCARTHY TETRAULT LLP 66 Wellington Street West Suite 5300, TD Bank Tower Box 48 Toronto, ON M5K 1E6</p> <p>Fax: 416.868.8772</p> <p>Canadian Counsel to the Agent and the Credit Facility Lenders</p>	<p>Heather Meredith Tel: 416-601-8342 Email: hmeredith@mccarthy.ca</p> <p>James D. Gage Tel: 416.601.7539 Email: jgage@mccarthy.ca</p> <p>Justin Lapedus Tel: 416.601.8289 Email: jlapedus@mccarthy.ca</p> <p>D.J. Lynde Tel: 416.601.8231 Email: dlynde@mccarthy.ca</p> <p>Natasha Rambaran Tel: 416.601.8110 Email: nrambaran@mccarthy.ca</p>

<p>CHAPMAN AND CUTLER LLP 111 West Monroe Street Chicago, IL 60603-4080</p> <p>Fax: 312.701.2361</p> <p>U.S. Counsel to the Credit Facility Lenders</p>	<p>Stephen R. Tetro II Tel: 312.845.3859 Email: stetro@chapman.com</p> <p>Michael Reed Tel: 312.845.3458 Email: mmreed@chapman.com</p>
<p>NORTON ROSE FULBRIGHT CANADA LLP Norton Rose Fulbright Canada LLP 400 3rd Avenue SW, Suite 3700 Calgary, AB T2P 4H2</p> <p>Fax: 403.264.5973</p> <p>NORTON ROSE FULBRIGHT US LLP 2200 Ross Avenue, Suite 3600 Dallas, Texas 75201-7932</p> <p>Fax: 214.855.8200</p> <p>Counsel to Shell Energy North America (Canada) Inc. and Shell Energy North America (US)</p>	<p>Howard Gorman Tel: 403.267.8144 Email: howard.gorman@nortonrosefulbright.com</p> <p>Ryan Manns Tel: 214.855.8304 Email: ryan.manns@nortonrosefulbright.com</p>
<p>DENTONS CANADA LLP 77 King St W Suite 400 Toronto, ON M5K 0A1</p> <p>Fax: 416.863.4592</p> <p>Canadian Counsel to BP Canada Energy Marketing Corp., BP Energy Company, BP Corporation North America Inc., and BP Canada Energy Group ULC</p>	<p>David Mann Tel: 403.268.7097 Email: david.mann@dentons.com</p> <p>Robert Kennedy Tel: 416.367.6756 Email: robert.kennedy@dentons.com</p> <p>Kenneth Kraft Tel: 416-863-4374 Email: kenneth.kraft@dentons.com</p> <p>Gordon Tarnowsky Tel: 1.403.268.3024 Email: gord.tarnowsky@dentons.com</p> <p>Mark A. Freake Tel: 416.863.4456 Email: mark.freake@dentons.com</p> <p>Michael D. Schafler Tel: 416.863.4457 Email: michael.schafler@dentons.com</p>

<p>HAYNES AND BOONE, LLP 1221 McKinney Street Suite 4000 Houston, TX 77010</p> <p>Fax: 713.547.2600</p> <p>HAYNES AND BOONE, LLP 1050 17th Street Suite 1800 Denver, CO 80265</p> <p>Fax: 303.382.6210</p> <p>U.S. Counsel to BP</p>	<p>Kelli Norfleet Tel: 713.547.2630 Email: kelli.norfleet@haynesboone.com</p> <p>Arsalan Muhammad Tel: 713.547.2257 Email: arsalan.muhammad@haynesboone.com</p> <p>Patrick L. Hughes Tel: 303.382.6221 Email: patrick.hughes@haynesboone.com</p>
<p>TORYS LLP 79 Wellington Street West, 30th Floor Box 270, TD South Tower Toronto, ON M5K 1N2</p> <p>Fax: 416.865.7380</p> <p>Counsel to the Term Loan Lenders (Sagard Credit Partners, LP, LVS III SPE XV LP, TOCU XVII LLC, HVS XVI LLC, and OC II LVS XIV LP)</p>	<p>Tony DeMarinis Tel: 416.865.8162 Email: tdemarinis@torys.com</p> <p>Scott Bomhof Tel: 416.865.7370 Email: sbomhof@torys.com</p>
<p>BORDEN LADNER GERVAIS LLP Barristers and Solicitors 22 Adelaide Street West Bay Adelaide Centre, East Tower Toronto, Ontario M5H 4E3</p> <p>Fax: 416.367.6749</p> <p>Counsel to Chubb Insurance Company of Canada</p>	<p>James W. MacLellan Tel: 416.367.6592 Email: jmaclellan@blg.com</p> <p>R. Bevan Brooksbank Tel: 416.367.6604 Email: brooksbank@blg.com</p>

<p>McMILLAN LLP Brookfield Place 181 Bay St, Suite 4400 Toronto ON M5J 2T3</p> <p>Counsel for Morgan Stanley Capital Group Inc.</p>	<p>Tushara Weerasooriya Tel: 416.865.7890 Email: tushara.weerasooriya@mcmillan.ca</p> <p>Shahen Mirakian Tel: 416.865.7238 Email: shahen.mirakian@mcmillan.ca</p> <p>Stephen Brown-Okruhlik Tel: 416.865.7043 Email: stephen.brown-okruhlik@mcmillan.ca</p>
<p>EXELON GENERATION COMPANY, LLC 100 Constellation Way, Suite 500C Baltimore, Maryland 21202</p>	<p>Patrick J. Woodhouse Assistant General Counsel Email: Patrick.Woodhouse@constellation.com</p> <p>Michael Strohmeier Email: Michael.Strohmeier@constellation.com</p>
<p>BRUCE POWER L.P. P.O. Box 1540, Building B10 177 Tie Road Municipality of Kincardine Tiverton, ON N0G 2T0</p> <p>Fax: 519.361.1845</p>	<p>Email: Bill.SCHNURR@brucepower.com</p> <p>Email: Sandra.MEYER@brucepower.com</p>
<p>EDF TRADING NORTH AMERICA, LLC 4700 West Sam Houston Parkway North Suite 250 Houston, TX 77041</p> <p>Fax: 281.653.1454</p>	<p>Email: Gerald.Nemec@edfenergyna.com</p> <p>Email: Frank.Smejkal@edfenergyna.com</p>

<p>NEXTERA ENERGY POWER MARKETING, LLC 700 Universe Blvd. Juno Beach, FL 33408</p> <p>Fax: 561.625.7642</p>	<p>Email: ELLIOT.BONNER@nexteraenergy.com</p> <p>Email: Allison.Ridder@nexteraenergy.com</p>
<p>MACQUARIE BANK LIMITED 50 Martin Place Sydney, NSW 2000 Australia</p> <p>Fax: 61.2.8232.4540</p> <p>Copy to:</p> <p>Macquarie Bank Limited Representative Office 500 Dallas Street, Suite 3300 Houston, TX 77002</p> <p>Fax: 713.275.8978</p>	<p>Email: FICC.notices@macquarie.com</p> <p>Copy to:</p> <p>Email: FICClegalHouston@Macquarie.com</p>
<p>MACQUARIE ENERGY CANADA LTD. 500 Dallas Street, Suite 3300 Houston, TX 77002</p> <p>Fax: 713.275.8978</p>	<p>Email: FICClegalHouston@Macquarie.com</p>
<p>MACQUARIE ENERGY LLC 500 Dallas Street, Suite 3300 Houston, TX 77002</p> <p>Fax: 713.275.8978</p>	<p>Email: FICClegalHouston@Macquarie.com</p>

<p>MORGAN STANLEY CAPITAL GROUP Morgan Stanley & Co. LLC 1585 Broadway Avenue New York, NY 10036</p> <p>Fax: 718.233.2140</p>	<p>Email: msloanservicing@morganstanley.com</p>
<p>BRITISH COLUMBIA UTILITIES COMMISSION Suite 410, 900 Howe Street Vancouver, BC V6Z 2N3</p> <p>Fax: (604) 660-1102</p> <p>Copy to :</p> <p>BRIDGEHOUSE LAW LLP 9th Floor, 900 West Hastings Street Vancouver, BC V6C 1E5</p> <p>Fax: (604) 684-0916</p>	<p>Email: commission.secretary@bcuc.com</p> <p>Copy to:</p> <p>Benjamin La Borie Tel: (236) 521-6150 Email: blaborie@bridgehouselaw.ca</p>
<p>FORTIS BC ENERGY INC. 16705 Fraser Highway Surrey, BC V4N 0E8</p>	<p>Email: gas.regulatory.affairs@fortisbc.com</p> <p>Email: electricity.regulatory.affairs@fortisbc.com</p>
<p>ALBERTA ELECTRICITY SYSTEM OPERATOR Calgary Place 2500, 330 – 5th Avenue SW Calgary, AB T2P 0L4</p> <p>Fax: 403.539.2949</p>	<p>Email: info@aeso.ca</p> <p>Chun Seto <i>Credit Risk Analyst</i> Email: Chun.Seto@aeso.ca</p>
<p>ALBERTA GOVERNMENT Commerce Place, 3rd Floor 10155 – 102 Street NW Edmonton, AB T5J 4L4</p>	<p>Scott Hood Statute Administration - Consumer Programs E-mail: scott.hood@gov.ab.ca</p>

<p>ALBERTA UTILITIES COMMISSION Eau Claire Tower 1400, 600 Third Avenue S.W. Calgary, Alberta T2P 0G5</p>	<p>JP Mousseau General Counsel Tel : (403) 592-4452 Email : jp.mousseau@auc.ab.ca</p>
<p>ATCO GAS AND PIPELINES LTD. 10035 – 105 Street P.O. Box 2426 Edmonton, AB T5J 2V6s</p> <p>Fax: 780.420.7928 / 780.420.3839</p> <p>Copy to:</p> <p>ATCO GAS AND PIPELINES LTD. 5302 Forand Street S.W. Calgary, AB T3E 1T9</p>	<p>Knox Davidson Senior Analyst, Credit Finance & Risk Email: Knox.Davidson@atco.com</p> <p>Email: RetailerContact@atcogas.com</p> <p>Email: Credit@ATCO.com</p>
<p>APEX UTILITIES INC. (formerly ALTAGAS UTILITIES INC.) 5509 – 45 Street Leduc, AB T9E 6T6</p> <p>Fax: 780.986.5220</p>	<p>Kristen Lozynsky Senior Regulatory Counsel Email : klozynsk@apexutilities.ca</p> <p>Email: regulatory@apexutilities.ca</p>
<p>ATCO ELECTRIC LTD. 10035 – 105 Street P.O. Box 2426 Edmonton, AB T5J 2V6</p> <p>Fax: 780.420.8984 / 780.420.7056</p> <p>Copy to:</p> <p>ATCO ELECTRIC LTD. 5302 Forand Street S.W. Calgary, AB T3E 1T9</p>	<p>Knox Davidson Senior Analyst, Credit Finance & Risk Email: Knox.Davidson@atco.com</p> <p>Email: RetailerServices@atcoelectric.com</p> <p>Email: Credit@ATCO.com</p>
<p>BATTLE RIVER POWER COOP P.O. Box 1420 Camrose, AB T4V 1X3</p> <p>Fax: 780.672.7969</p>	<p>Email: brpc@brpower.coop</p>

<p>TOWN OF CARDSTON 67 3rd Avenue West P.O. Box 280 Cardston, AB T0K 0K0</p> <p>Fax: 403.562.2499</p>	
<p>BLAKE, CASSELS & GRAYDON LLP 595 Burrard Street, Suite 2600 Vancouver, BC V7X 1L3</p> <p>Fax: 604.631.3309</p> <p>Counsel to ENMAX Power Corporation</p>	<p>Peter Bychawski Tel: 604.631.4218 Email: peter.bychawski@blakes.com</p>
<p>BLAKE, CASSELS & GRAYDON LLP 3500 Bankers Hall East 855 - 2nd Street S.W., Suite 3500 Calgary AB T2P 4J8</p> <p>Fax: 403.260.9700</p> <p>Counsel for Macquarie Energy LLC and Macquarie Energy Canada Ltd.</p>	<p>Kelly J Bourassa Tel : 1.403.260.9697 Email: kelly.bourassa@blakes.com</p>
<p>EPCOR DISTRIBUTION AND TRANSMISSION INC. 2000 – 10423 101 Street NW Edmonton, AB T5H 0E8</p>	<p>Teresa Crotty-Wong Senior Legal Counsel and Ethics Officer Email: Tcrotty-wong@epcor.com</p> <p>Copy to:</p> <p>Legal department: Email: legaldeptinqu@epcor.com</p>
<p>TOWN OF FORT MACLEOD P.O. Box 1420 Fort Macleod, AB T0L 0Z0</p> <p>Fax: 403.553.2426</p>	<p>Email: gloria@fortmacleod.com</p> <p>Copy to:</p> <p>Email: admin@fortmacleod.com</p>

<p>FORTIS ALBERTA INC. 320 – 17th Avenue SW Calgary, AB T2S 2V1</p> <p>Fax: : 403.514.4001</p>	<p>Email: sharon.wong@fortisalberta.com</p>
<p>EQUUS REA LTD. 5803 – 42 Street Innisfail, AB T4G 1S8</p> <p>Fax: 403.227.1007</p>	<p>Email: cglazer@equs.ca</p>
<p>LETHBRIDGE ELECTRIC UTILITY City of Lethbridge / Infrastructure Services 910 4th Avenue South Lethbridge, AB T1J 0P6</p> <p>Fax: 403.320.4195</p>	<p>Brian Loewen General Counsel - City of Lethbridge</p> <p>Tel: 403.320.3043 Email: brian.loewen@lethbridge.ca</p>
<p>CITY OF RED DEER Red Deer Electric Light and Power 4914 48 Avenue Red Deer, AB T4N 3T3</p> <p>CITY OF RED DEER Red Deer Electric Light and Power Bldg 300 7721 40 Avenue Red Deer, AB T4P 0K2</p> <p>Fax: 403.341.6806</p>	
<p>TOWN OF PONOKA 5102 – 48th Avenue Ponoka, AB T4J 1P7</p> <p>Copy to:</p> <p>TOWN OF PONOKA #200 5604 50 Street Ponoka, AB T4J 1G5</p>	<p>Email: utilities@ponoka.ca</p>

<p>MUNICIPALITY OF CROWSNEST PASS Box 600 Blairmore, AB T0K 0E0</p>	<p>Email: utilities@crowstnestpass.com</p>
<p>SASKATCHEWAN FINANCIAL AND CONSUMER AFFAIRS AUTHORITY Consumer Protection Division 500 – 1919 Saskatchewan Drive Regina, SK S4P 4H2</p>	<p>Email: fcaa@gov.sk.ca</p>
<p>SASKENERGY INCORPORATED 1000 – 1777 Victoria Avenue Regina, SK S4P 4K5</p> <p>Fax: 306.565.3332</p>	
<p>PUBLIC UTILITIES BOARD 400 – 330 Portage Ave Winnipeg, MB R3C 0C4</p> <p>Fax: 204.945.2643</p>	<p>Email: Rachel.McMillin@gov.mb.ca</p> <p>Email: Kristen.Schubert@gov.mb.ca</p> <p>Copy to: Email: publicutilities@gov.mb.ca</p>
<p>MANITOBA HYDRO 360 Portage Avenue Winnipeg, MB R3C 0G8</p>	<p>Email: dmartin@hydro.mb.ca</p> <p>Email: BACzarnecki@hydro.mb.ca</p>
<p>CENTRA GAS MANITOBA INC. 12th Floor – 360 Portage Avenue PO Box 815 Winnipeg, MB R3C 2P4</p> <p>Fax: 204.360.6127</p>	<p>Christine Foulkes Manager, Gas Market Operations Gas Supply Department Email: cdfoulkes@hydro.mb.ca</p> <p>Andrew Neil Senior Credit Risk Officer Email: aneil@hydro.mb.ca</p>

<p>INDEPENDENT ELECTRICITY SYSTEM OPERATOR 1600 – 120 Adelaide Street West Toronto, ON M5H 1T1</p> <p>Fax: 416.506.2843</p>	<p>Victor Buza Email: victor.buza@ieso.ca</p> <p>Michael Lyle, GC Email: michael.lyle@ieso.ca</p>
<p>STIKEMAN ELLIOTT LLP Barristers & Solicitors 5300 Commerce Court West 199 Bay Street Toronto, Canada M5L 1B9</p> <p>Fax: 416.947.0866</p> <p>Counsel for the Independent Electricity System Operator</p>	<p>Maria Konyukhova Tel: 416.869.5230 Email: mkonyukhova@stikeman.com</p>
<p>ONTARIO ENERGY BOARD 2300 Yonge Street, 27th floor P.O. Box 2319 Toronto, ON M4P 1E4</p> <p>Fax: 416.440.7656</p>	<p>Email: registrar@oeb.ca</p>
<p>ALGOMA POWER INC. 2 Sackville Road, Suite A Sault Ste. Marie, ON P6B 6J6</p> <p>Fax: 705.253.6476</p> <p>Copy to:</p> <p>ALGOMA POWER INC. 1130 Bertie Street P.O. Box 1218 Fort Erie, ON L2A 5Y2</p>	<p>Email: peggy.lund@algomapower.com</p> <p>Copy to:</p> <p>Email: regulatoryaffairs@fortisontario.com</p>

<p>ATIKOKAN HYDRO INC. 117 Gorrie Street Atikokan, ON P0T 1C0</p> <p>Fax: 807.597.6988</p> <p>Copy to:</p> <p>ATIKOKAN HYDRO INC. P.O. Box 1480 Atikokan, ON P0T 1C0</p>	<p>Email: info@athydro.com</p> <p>Copy to:</p> <p>Email: jen.wiens@athydro.com</p>
<p>BLUEWATER POWER DISTRIBUTION CORPORATION 855 Confederation Street Sarnia, ON N7T 7L6</p> <p>Fax: 519.344.7303</p>	<p>Email: kgadsby@bluewaterpower.com</p> <p>Copy to:</p> <p>Email: regulatory@bluewaterpower.com</p>
<p>BRANT COUNTY POWER INC. 65 Dundas Street East Paris, ON N3L 3H1</p> <p>Fax: 519.442.3701</p> <p>Copy to:</p> <p>ENERGY+ INC. 1500 Bishop Street P.O. Box 1060 Cambridge, ON N1R 5X6</p>	<p>Email: regulatoryaffairs@energyplus.ca</p>
<p>BRANTFORD POWER INC. 150 Savannah Oaks Drive Box 308 Brantford, ON N3T 5N8</p> <p>Fax: 519.753.6130</p>	<p>Email: regulatory@brantford.ca</p>

<p>BURLINGTON HYDRO INC. 1340 Brant Street Burlington, ON L7R 3Z7</p> <p>Fax: 905.332.2133</p>	<p>Email: regulatoryaffairs@burlingtonhydro.com</p> <p>Adam Pappas Director, Regulatory Affairs Tel: (905) 332-2341 Email: apappas@burlingtonhydro.com</p>
<p>CAMBRIDGE & NORTH DUMFRIES HYDRO INC. C/O ENERGY+ INC. 1500 Bishop Street P.O. Box 1060 Cambridge, ON N1R 5X6</p> <p>Fax: 519.621.0383</p>	<p>Email: regulatoryaffairs@energyplus.ca</p>
<p>CANADIAN NIAGARA POWER INC. 1130 Bertie Street P.O. Box 1218 Fort Erie, ON L2A 5Y2</p> <p>Fax: 905.871.8818</p>	<p>Email: regulatoryaffairs@fortisontario.com</p>
<p>CENTRE WELLINGTON HYDRO LTD. 730 Gartshore Street P.O. Box 217 Fergus, ON N1M 2W8</p> <p>Fax: 519.843.7601</p>	<p>Email: regulatory@cwhydro.ca</p>
<p>CHAPLEAU PUBLIC UTILITIES CORPORATION 110 Lorne Street South Chapleau, ON P0M 1K0</p> <p>Fax: 705.864.1962</p>	<p>Email: chec@onlink.net</p> <p>Copy to:</p> <p>Email: jcyr.puc@chapleau.ca</p>
<p>COLLUS POWER CORP. C/O EPCOR ELECTRICITY DISTRIBUTION ONTARIO INC. 43 Steward Road P.O. Box 189 Collingwood, ON L9Y 3Z5</p> <p>Fax: 705.445.8267</p>	<p>Email: onreg.electricity@epcor.com</p>

<p>COOPERATIVE HYDRO EMBRUN INC. 821 Notre-Dame Street, Suite 200 Embrun, ON K0A 1W1</p> <p>Fax: 613.443.0495</p>	<p>Email: benoit@hydroembrun.ca</p>
<p>E.L.K. ENERGY INC. 172 Forest Avenue Essex, ON N8M 3E4</p> <p>Fax: 519.776.5640</p>	
<p>ENERSOURCE HYDRO MISSISSAUGA INC. 3240 Mavis Road Mississauga, ON L5C 3K1</p> <p>Fax: 905.566.2727</p> <p>Copy to:</p> <p>ALECTRA UTILITIES CORPORATION 2185 Derry Road West Mississauga, ON L5N 7A6</p>	<p>Email: emuscat@enersource.com</p> <p>Copy to:</p> <p>Email: regulatoryaffairs@alecrautilities.com</p>
<p>ENTEGRUS POWERLINES INC. 320 Queen Street PO Box 70 Chatham, ON N7M 5K2</p> <p>Fax: 519.351.4059</p>	<p>Email: Tracy.Manso@entegrus.com</p> <p>Copy to:</p> <p>Email: regulatory@entegrus.com</p>
<p>ENTEGRUS POWERLINES INC. [MIDDLESEX] 351 Frances Street Strathroy, ON N7G 2L7</p> <p>Fax: 519.245.5384</p>	<p>Email: ana.couto@entegrus.com</p> <p>Copy to:</p> <p>Email: regulatory@entegrus.com</p>

<p>ENWIN UTILITIES LTD. 787 Oulette Avenue Windsor, ON N9A 5T7</p> <p>Fax: 519.973.7812</p> <p>Copy to:</p> <p>ENWIN UTILITIES LTD. 4545 Rhodes Drive P.O. Box 1625, Station A Windsor, ON N8W 5T1</p>	<p>Email: retailerrelations@enwin.com</p> <p>Copy to:</p> <p>Email: regulatory@enwin.com</p>
<p>ERIE THAMES POWERLINES C/O EARTH POWER CORPORATION 143 Bell Street P.O. Box 157 Ingersoll, ON N5C 3K5</p> <p>Fax: 519.485.5838</p>	<p>Email: oeb@eriethamespower.com</p>
<p>ESPANOLA REGIONAL HYDRO DISTRIBUTION CORPORATION 598 Second Avenue Espanola, ON P5E 1C4</p> <p>Fax: 705.869.2433</p> <p>Copy to:</p> <p>ESPANOLA REGIONAL HYDRO DISTRIBUTION CORPORATION 500 Second Line East Sault Ste. Marie, ON P6B 4K1</p>	<p>Melissa Casson Email: mcasson@northbayhydro.com</p> <p>Gloria Sauve Email: GSauve@northbayhydro.com</p>
<p>ESSEX POWERLINES CORPORATION 2730 Highway 3 Oldcastle, ON N0R 1L0</p> <p>Fax: 519.737.7064</p>	<p>Email: jbarile@essexpowerlines.ca</p>

<p>FESTIVAL HYDRO INC. 187 Erie Street PO Box 397 Stratford, ON N5A 6T5</p> <p>Fax: 519.271.7204</p>	<p>Megan Winchester Email: mwinchester@festivalhydro.com</p> <p>Copy to:</p> <p>Jeff Graham (CEO) Email: grahamj@festivalhydro.com</p>
<p>FORT FRANCES POWER CORPORATION 320 Portage Avenue Fort Frances, ON P9A 3P9</p> <p>Fax: 807.274.9375</p>	<p>Email: info@ffpc.ca</p>
<p>GREATER SUDBURY HYDRO INC. 500 Regent Street PO Box 250 Sudbury, ON P3E 4P1</p> <p>Fax: 705.671.1413</p>	<p>Email: jodiek@shec.com</p> <p>Copy to:</p> <p>Email: regulatoryaffairs@gsuinc.ca</p>
<p>GRIMSBY POWER INC. 231 Roberts Road Grimsby, ON L3M 5N2</p> <p>Fax: 905.945.9933</p>	<p>Email: regulatoryaffairs@grimsbypower.com</p>
<p>GUELPH HYDRO ELECTRIC SYSTEMS INC. 395 Southgate Drive Guelph, ON N1G 4Y1</p> <p>Fax: 519.822.0960</p> <p>Copy to:</p> <p>ALECTRA UTILITIES CORPORATION 2185 Derry Road West Mississauga, ON L5N 7A6</p>	<p>Christina Koren Email: christina.koren@alectrautilities.com</p> <p>Copy to:</p> <p>Email: regulatoryaffairs@alectrautilities.com</p>

<p>HALDIMAND COUNTY HYDRO INC. 1 Greendale Drive Caledonia, ON N3W 2J3</p> <p>Fax: 905.765.8211</p> <p>Copy to:</p> <p>HYDRO ONE NETWORKS INC. 483 Bay Street, South Tower, 7th Floor Toronto, ON M5G 2P5</p> <p>Fax: (416) 345-6972</p>	<p>Email: paul.harricks@hydroone.com</p> <p>Michael Engelberg Tel: (416) 345-6305 Email: mengelberg@HydroOne.com</p>
<p>HALTON HILLS HYDRO INC. 43 Alice Street Acton, ON L7J 2A9</p> <p>Fax: 519.853.5592</p>	<p>Tracy Rehberg-Rawlingson Regulatory Affairs Officer Tel: 519.853.3700 x257</p> <p>Email: tracyr@haltonhillshydro.com</p>
<p>HEARST POWER DISTRIBUTION COMPANY LTD. 925 rue Alexander Street P.O. Bag 5000 Hearst, ON P0L 1N0</p> <p>Fax: 705.362.5092</p>	<p>Email: jrichard@hearstpower.com</p>
<p>HORIZON UTILITIES CORPORATION 55 John Street North PO Box 2249, Stn LCD 1 Hamilton, ON L8N 3E4</p> <p>Fax: 905.522.5670</p> <p>Copy to:</p> <p>ALECTRA UTILITIES CORPORATION 2185 Derry Road West Mississauga, ON L5N 7A6</p>	<p>Email: regulatoryaffairs@alecrautilities.com</p>
<p>HYDRO 2000 INC. 440 St. Philippe Street Alfred, ON K0B 1A0</p> <p>Fax: 613.679.0452</p>	<p>Email: lisewilkinson@hydro2000.ca</p>

<p>HYDRO HAWKESBURY INC. 850 Tupper Street Hawkesbury, ON K6A 3S7</p> <p>Fax: 613.632.8603</p>	<p>Email: service@hydrohawkesbury.ca</p>
<p>HYDRO ONE NETWORKS INC. 483 Bay Street, TCT14 Toronto, ON M5G 2P5</p> <p>Fax: 416.345.5957</p> <p>Copy to:</p> <p>HYDRO ONE NETWORKS INC. 483 Bay Street, South Tower, 7th Floor Toronto, ON M5G 2P5</p>	<p>Email: regulatory@hydroone.com</p>
<p>HYDRO ONE BRAMPTON NETWORKS INC. 175 Sandalwood Parkway West Brampton, ON L7A 1E8</p> <p>Fax: 905.840.1915</p> <p>Copy to:</p> <p>ALECTRA UTILITIES CORPORATION 2185 Derry Road West Mississauga, ON L5N 7A6</p>	<p>Email: regulatoryaffairs@alectrautilities.com</p>
<p>HYDRO OTTAWA LIMITED 3025 Albion Road North Ottawa, ON K1G 3S4</p> <p>Fax: 613.738.5485</p> <p>Copy to:</p> <p>HYDRO OTTAWA LIMITED 2711 Hunt Club Road P.O. Box 8700 Ottawa, ON K1G 3S4</p>	<p>Email: regulatoryaffairs@hydroottawa.com</p>

<p>INNISFIL HYDRO DISTRIBUTION SYSTEMS LIMITED 2073 Commerce Park Drive Innisfil, ON L9S 4A2</p> <p>Fax: 705.431.6872</p> <p>Copy to:</p> <p>INNPOWER CORPORATION 7251 Yonge Street Innisfil, ON L9S 0J3</p>	<p>Email: regulatoryaffairs@innpower.ca</p>
<p>KENORA HYDRO ELECTRIC CORPORATION LTD. 215 Mellick Avenue Box 2680 Kenora, ON P9N 3X8</p> <p>Fax: 807.467.2068</p> <p>Copy to:</p> <p>SYNERGY NORTH CORPORATION 34 Cumberland Street North Thunder Bay, ON P7A 4L4</p>	<p>Email: jrobertson@kenora.ca</p> <p>Copy to:</p> <p>Email: regulatory@synergynorth.ca</p>
<p>KINGSTON HYDRO CORPORATION 1211 John Counter Boulevard P.O. Box 790 Kingston, ON K7L 4X7</p>	<p>Email: rmurphy@utilitieskingston.com</p> <p>Copy to:</p> <p>Email: regulatory@kingstonhydro.com</p>
<p>KITCHENER-WILMOT HYDRO INC. 301 Victoria Street South P.O. Box 9010 Kitchener, ON N2G 4L2</p> <p>Fax: 519.745.3631</p>	<p>Email: jvanooteghem@kwhydro.ca</p> <p>Margaret Nanninga Vice-President Finance & CFO Tel: 519.749.6177 Email: MNanninga@KWHydro.ca</p> <p>Denise Michaud Email: dmichaud@kwhydro.ca</p>

<p>LAKEFRONT UTILITY SERVICES INC. 207 Division Street PO Box 577 Cobourg, ON K9A 4L3</p> <p>Fax: 905.372.2581</p>	<p>Email: dpaul@lusi.on.ca</p> <p>Copy to:</p> <p>Email: regulatory@lusi.on.ca</p>
<p>LAKELAND POWER DISTRIBUTION LTD 200 - 395 Centre Street North Huntsville, ON P1H 2M2</p> <p>Fax: 705.789.3110</p>	<p>Email: sshipston@lakelandpower.on.ca</p> <p>Copy to:</p> <p>Email: regulatory-affairs@lakelandpower.on.ca</p>
<p>LONDON HYDRO INC. 111 Horton Street East P.O. Box 2700 London, ON N6B 3N9</p> <p>Fax: 519.661.5838</p>	<p>Email: regulatoryaffairs@londonhydro.com</p>
<p>MIDLAND POWER UTILITY CORPORATION 16984 Highway 12 PO Box 820 Midland, ON L4R 4P4</p> <p>Fax: 705.526.7890</p> <p>Copy to:</p> <p>NEWMARKET-TAY POWER DISTRIBUTION LTD. 590 Steven Court Newmarket, ON L3Y 6Z2</p>	<p>Email: chuma@midlandpuc.on.ca</p> <p>Copy to:</p> <p>Email: regulatory@nmhydro.ca</p>
<p>MILTON HYDRO DISTRIBUTION INC. 8069 Lawson Road Milton, ON L9T 5C4</p> <p>Fax: 905.876.2044</p> <p>Copy to:</p> <p>MILTON HYDRO DISTRIBUTION INC. 200 Chisholm Drive Milton, ON L9T 3G9</p>	<p>Email: igor.rusic@miltonhydro.com</p> <p>Copy to:</p> <p>Email: regulatory@miltonhydro.com</p>

<p>NEWMARKET HYDRO C/O NEWMARKET-TAY POWER DISTRIBUTION LTD. 590 Steven Court Newmarket, ON L3Y 6Z2</p> <p>Fax: 905.895.8931</p>	<p>Email: regulatory@nmhydro.ca</p>
<p>NIAGARA ON THE LAKE HYDRO INC. 8 Henegan Road P.O. Box 460 Virgil, ON L0S 1T0</p> <p>Fax: 905.468.3861</p>	<p>Email: tcurtis@notlhydro.com</p>
<p>NIAGARA PENINSULA ENERGY 7447 Pin Oak Drive Box 120 Niagara Falls, ON L2E 6S9</p> <p>Fax: 905.356.0118</p>	<p>Email: Margaret.battista@npei.ca</p>
<p>NORFOLK POWER DISTRIBUTION INC. 70 Victoria Street PO Box 588 Simcoe, ON N3Y 4N6</p> <p>Fax: 519.426.4514</p> <p>Copy to:</p> <p>HYDRO ONE NETWORKS INC. 483 Bay Street, South Tower, 7th Floor Toronto, ON M5G 2P5</p>	<p>Email: regulatory@hydroone.com</p>
<p>NORTH BAY HYDRO DISTRIBUTION LIMITED 74 Commerce Crescent P.O. Box 3240 North Bay, ON P1B 8Y5</p> <p>Fax: 705.474.8579</p>	<p>Email: gsauve@northbayhydro.com</p> <p>Copy to:</p> <p>Email: regulatoryaffairs@northbayhydro.com</p>

<p>NORTHERN ONTARIO WIRES INC. 153 Sixth Avenue Box 640 Cochrane, ON P0L 1C0</p> <p>Fax: 705.272.2311</p>	<p>Email: sandras@nowinc.ca</p> <p>Copy to:</p> <p>Email: regulatory@nowinc.ca</p>
<p>OAKVILLE HYDRO-ELECTRIC DISTRIBUTION INCORPORATED 861 Redwood Square P.O. Box 1900 Oakville, ON L6J 5E3</p> <p>Fax: 905.825.4460</p>	<p>Maryanne Wilson Email: mwilson@oakvillehydro.com</p> <p>Copy to:</p> <p>Email: regulatoryaffairs@oakvillehydro.com</p>
<p>ORANGEVILLE HYDRO LIMITED 400 C Line Road Orangeville, ON L9W 2Z7</p> <p>Fax: 519.941.6061</p>	<p>Email: regulatoryaffairs@orangevillehydro.on.ca</p>
<p>ORILLIA POWER DISTRIBUTION CORPORATION 360 West Street South PO Box 398 Orillia, ON L3V 6J9</p> <p>Fax: 705.326.0800</p> <p>Copy to:</p> <p>HYDRO ONE NETWORKS INC. 483 Bay Street, South Tower, 7th Floor Toronto, ON M5G 2P5</p>	<p>Email: phurley@orilliapower.ca</p> <p>Copy to:</p> <p>Email: regulatory@hydroone.com</p>
<p>OSHAWA PUC NETWORKS INC. 100 Simcoe Street South Oshawa, ON L1H 7M7</p> <p>Fax: 905.723.7947</p>	<p>Susanna Beckstead Vice President – Finance, Corporate and Business Services Tel: 905.743.5209 Email: sbeckstead@opuc.on.ca</p> <p>Copy to:</p> <p>Email: regulatory.affairs@opuc.on.ca</p>

<p>OTTAWA RIVER POWER CORPORATION 283 Pembroke Street West Pembroke, ON K8A 6Y6</p> <p>Fax: 613.732.8199</p>	<p>Email: jallen@orpowercorp.com</p>
<p>PARRY SOUND POWER CORPORATION 125 William Street Parry Sound, ON P2A 1V9</p> <p>Fax: 705.746.7789</p> <p>Copy to:</p> <p>LAKELAND POWER DISTRIBUTION LTD. 200-395 Centre Street North Huntsville, ON P1H 2M2</p>	<p>Email: Regulatory-affairs@lakelandpower.on.ca</p>
<p>PETERBOROUGH DISTRIBUTION INC. 1867 Ashburnham Drive PO Box 4125, Station Main Peterborough, ON K9J 6Z5</p> <p>Fax: 705.748.4358</p> <p>Copy to:</p> <p>HYDRO ONE NETWORKS INC. 483 Bay Street, South Tower, 7th Floor Toronto, ON M5G 2P5</p>	<p>Email: jstephenson@peterboroughutilities.ca</p> <p>Copy to:</p> <p>Email: regulatory@hydroone.com</p>
<p>POWERSTREAM INC. 161 Cityview Boulevard Vaughn, ON L4H 0A9</p> <p>Fax: 905.532.4505</p> <p>Copy to:</p> <p>ALECTRA UTILITIES CORPORATION 2185 Derry Road West Mississauga, ON L5N 7A6</p>	<p>Email: regulatoryaffairs@alecrautilities.com</p>

<p>PUC DISTRIBUTION INC. 765 Queen Street East P.O. Box 9000 Sault Ste. Marie, ON P6A 6P2</p> <p>Fax: 705.759.6553</p>	<p>Email: Jennifer.uchmanowicz@ssmpuc.com</p> <p>Copy to:</p> <p>Email: regulatory@ssmpuc.com</p>
<p>RENFREW HYDRO INC. 29 Bridge Street Renfrew, ON K7V 3R3</p> <p>Fax: 613.432.7463</p>	<p>Email: regulatory@renfrewhydro.com</p>
<p>RIDEAU ST. LAWRENCE DISTRIBUTION INC. 985 Industrial Road Prescott, ON K0E 1T0</p> <p>Fax: 613.925.0303</p>	<p>Email: jwalsh@rslu.ca</p>
<p>SIOUX LOOKOUT HYDRO INC. 25 Fifth Avenue PO Box 908 Sioux Lookout, ON P8T 1B3</p> <p>Fax: 807.737.2832</p>	<p>Email: slhydro@tbaytel.net</p> <p>Copy to:</p> <p>Email: dkulchyski@siouxlookouthydro.com</p>
<p>ST. THOMAS ENERGY INC. 135 Edward Street St. Thomas, ON N5P 4A8</p> <p>Fax: 519.631.4771</p> <p>Copy to:</p> <p>ENTEGRUS POWERLINES INC. 320 Queen Street P.O. Box 70 Chatham, ON N7M 5K2</p>	<p>Email: regulatory@entegrus.com</p>

<p>TAY HYDRO C/O NEWMARKET-TAY POWER DISTRIBUTION LTD. 590 Steven Court Newmarket, ON L3Y 6Z2</p> <p>Fax: 905.895.8931</p>	<p>Email: regulatory@nmhydro.ca</p>
<p>THUNDER BAY HYDRO ELECTRICITY DISTRIBUTION INC. C/O SYNERGY NORTH CORPORATION 34 Cumberland Street North Thunder Bay, ON P7A 4L4</p> <p>Fax: 807.343.0230</p>	<p>Email: twilson@tbhydro.on.ca</p> <p>Copy to:</p> <p>Email: regulatory@synergynorth.ca</p>
<p>TILLSONBURG HYDRO INC. 200 Broadway Street Tillsonburg, ON N4G 5A7</p> <p>Fax: 519.842.9431</p> <p>Copy to:</p> <p>TILLSONBURG HYDRO INC. 10 Lisgar Avenue Tillsonburg, ON N4G 5A5</p>	<p>Ravi Baichan General Manager Email: rbaichan@tillsonburg.ca</p>
<p>TORONTO HYDRO-ELECTRIC SYSTEM LIMITED 5800 Yonge Street, 2nd Floor Toronto, ON M2M 3T3</p> <p>Fax: 416.542.3445 / 416.542.3452</p> <p>Copy to:</p> <p>TORONTO HYDRO-ELECTRIC SYSTEM LIMITED 14 Carlton Street Toronto, ON M5B 1K5</p>	<p>Email: epage@torontohydro.com</p> <p>Copy to:</p> <p>Email: regulatoryaffairs@torontohydro.com</p>

<p>VERIDIAN CONNECTIONS INC. 1465 Pickering Parkway Pickering, ON L1V 7G7</p> <p>Fax: 905.837.7861</p> <p>Copy to:</p> <p>ELEXICON ENERGY INC. 55 Taunton Road E. PO 59 Whitby, ON L1N 5R8</p>	<p>Lucy Lombardi Email: llombardi@elexiconenergy.com</p>
<p>WASAGA DISTRIBUTION INC. 950 River Road West P.O. Box 20 Wasaga Beach, ON L9Z 1A2</p> <p>Fax: 705.429.2590</p>	<p>Email: d.stavinga@wasagadist.ca</p>
<p>WATERLOO NORTH HYDRO INC. 526 Country Squire Road P.O. Box 640 Waterloo, ON N2J 4A3</p> <p>Fax: 519.746.0133</p>	<p>Email: retinfo@wnhydro.com</p>
<p>WELLAND HYDRO-ELECTRIC SYSTEM CORP. 950 Main Street East P.O. Box 280 Welland, ON L3B 5P6</p> <p>Fax: 905.732.0123</p>	<p>Perry Orosz Director of Customer Service and Employee Relations Tel: 905.732.1381 ext. 241</p> <p>Email: porosz@wellandhydro.com</p>
<p>WELLINGTON NORTH POWER INC. 290 Queen Street West P.O. Box 359 Mount Forest, ON N0G 2L0</p> <p>Fax: 519.323.2425</p>	<p>Email: rbucknall@wellingtonnorthpower.com</p>

<p>WEST COAST HURON ENERGY INC. 57 West Street Goderich, ON N7A 2K5</p> <p>Fax: 519.524.7209</p> <p>Copy to:</p> <p>ERTH POWER CORPORATION 143 Bell Street P.O. Box 157 Ingersoll, ON N5C 3K5</p>	<p>Email: oeb@eriethamespower.com</p>
<p>WESTARIO POWER INC. 24 Eastridge Road RR#2 Walkerton, ON N0G 2V0</p> <p>Fax: 519.507.6777</p>	<p>Malcolm McCallum Vice President Finance/CFO Email: Malcolm.McCallum@westario.com</p>
<p>WHITBY HYDRO ELECTRIC CORPORATION 100 Taunton Road East P.O. Box 59 Whitby, ON L1N 5R8</p> <p>Fax: 905.668.9379</p> <p>Copy to:</p> <p>ELEXICON ENERGY INC. 55 Taunton Road E. PO 59 Whitby, ON L1N 5R8</p>	<p>Email: sreffle@whitbyhydro.on.ca</p> <p>Copy to:</p> <p>Email: llombardi@elexiconenergy.com</p>

<p>WOODSTOCK HYDRO SERVICES INC. P.O. Box 1598 Woodstock, ON N4S 0A8</p> <p>Fax: 519.537.5081</p> <p>Copy to:</p> <p>HYDRO ONE NETWORKS INC. 483 Bay Street, South Tower, 7th Floor Toronto, ON M5G 2P5</p>	<p>Email: regulatory@hydroone.com</p>
<p>CORPORATION OF THE CITY OF KITCHENER City Hall, Utilities Division, 5th Floor 200 King Street West Kitchener, ON N2G 4G7</p>	<p>Email: KU-sups@kitchener.ca</p>
<p>UTILITIES KINGSTON PO Box 790 1211 John Counter Boulevard Kingston, ON K7L 4X7</p>	<p>Email: ntaylor@utilitieskingston.com</p>
<p>GAZ METRO LIMITED PARTNERSHIP C/O ENERGIR 1717 du Havre Street Montreal, QC H2K 2X3</p> <p>Fax: 514.598.3678</p>	<p>Email: info@energir.com</p>
<p>TRAVELERS Travelers Bond & Specialty Insurance 215 Shuman Blvd Naperville, IL 60563</p>	<p>Email: ESHARIE@travelers.com</p>

<p>ZURICH SURETY 600 Red Brook Blvd. Fourth Floor, Suite 600 Owings Mills, MD 21117</p>	<p>Email: Howard.uniman@zurichna.com</p>
<p>SISKINDS LLP 680 Waterloo Street London, ON N6A 3V8</p> <p>Fax: 519.672.6065</p> <p>SISKINDS LLP 100 Lombard Street, Suite 302 Toronto, ON M5C 1M3</p> <p>Fax: 416.594.4589</p> <p>Counsel to the Plaintiff, Stephen Gilchrist (in proposed securities class proceeding in SCJ at Toronto, File No. CV-19-627174-00CP)</p>	<p>Michael G. Robb Tel: 519.672.2121 Email: michael.robb@siskinds.com</p> <p>Tyler Planeta Tel: 416.594.4588 Email: tyler.planeta@siskinds.com</p>
<p>KIM SPENCER McPHEE BARRISTERS P.C. 1200 Bay Street, Suite 1203 Toronto, ON M5R 2A5</p> <p>Fax: 416.598.0601</p> <p>Counsel to the Plaintiff, Stephen Gilchrist (in proposed securities class proceeding in SCJ at Toronto, File No. CV-19-627174-00CP)</p>	<p>Albert Pelletier Tel: 416.596.1414 Email: ap@complexlaw.ca</p> <p>Charlotte K.B. Harman Tel: 416.596.1414 Email: ckbh@complexlaw.ca</p>
<p>MICHIGAN PUBLIC SERVICE COMMISSION 7109 W. Saginaw Highway Lansing, MI 48917</p>	<p>Stephanie Haney Resource Adequacy and Retail Choice Section Energy Resources Division</p> <p>Tel: 517.284.8267 Email: HaneyS1@michigan.gov</p>

<p>SHIPMAN & GOODWIN LLP One Constitution Plaza Hartford, Connecticut 06103 USA</p> <p>Fax: 860.251.5218</p> <p>SHIPMAN & GOODWIN LLP 300 Atlantic Street, 3rd Floor Stamford, Connecticut 06901 USA</p> <p>Fax: 203.324.8199</p> <p>U.S. Counsel to ISO New England Inc.</p>	<p>Eric Goldstein Tel: 860.251.5059 Email: EGoldstein@goodwin.com</p> <p>Copy to: Email: bankruptcy@goodwin.com</p> <p>Jessica M. Signor Tel: 203.324.8138 Email: JSignor@goodwin.com</p>
<p>BENNETT JONES LLP 3400 One First Canadian Place P.O. Box 130 Toronto, Ontario M5X 1A4</p> <p>Fax: 416.863.1716</p> <p>Counsel to Red Ventures, LLC</p>	<p>Aiden Nelms Tel: 416.777.4642 Email: nelmsa@bennettjones.com</p>
<p>LONGVIEW COMMUNICATIONS AND PUBLIC AFFAIRS Suite 2200 – 161 Bay Street PO Box 231 Toronto ON Canada M5J 2S1</p> <p>Communications Advisor</p>	<p>Joel Shaffer Partner Tel: 416.649.8006 Email: jshaffer@longviewcomms.ca</p> <p>Boyd Erman Email: berman@longviewcomms.ca</p> <p>Peter Block Email: pblock@longviewcomms.ca</p>

<p>KOSKIE MINSKY LLP 20 Queen Street West, Suite 900, Box 52 Toronto, ON M5H 3R3</p> <p>Fax: 416.204.2894</p> <p>Counsel for Haidar Omarali in his capacity as Representative Plaintiff in <i>Omarali v. Just Energy</i></p>	<p>David Rosenfeld Tel: 416.595.2700 Email: drosenfeld@kmlaw.ca</p> <p>James Harnum Tel: 416.542.6285 Email: jharnum@kmlaw.ca</p> <p>Aryan Ziaie Tel: 416.595.2104 Email: aziaie@kmlaw.ca</p>
<p>GOWLING WLG (CANADA) LLP Barristers & Solicitors 1 First Canadian Place 100 King Street West, Suite 1600 Toronto, ON M5X 1G5</p> <p>Fax: 416.862.7661</p> <p>Counsel for NextEra Energy Marketing, LLC</p>	<p>Virginie Gauthier Tel: 416.844.5391 Email: Virginie.Gauthier@gowlingwlg.com</p>
<p>WEISZ FELL KOUR LLP 100 King Street West, Suite 5600 Toronto, ON M5X 1C9</p> <p>Fax: 416.613.8290</p> <p>Counsel for the Ontario Energy Board</p>	<p>Pat Corney Tel: 416.613.8287 Email: pcorney@wfklaw.ca</p> <p>Steven Weisz Tel: 416.613.8281 Email: sweisz@wfklaw.ca</p>
<p>JENSEN SHAWA SOLOMON DUGUID HAWKES LLP 800, 304-8 Avenue SW Calgary, Alberta T2P 1C2</p> <p>Fax: 403.571.1528</p> <p>Counsel for Alberta Electric System Operator</p>	<p>Christa Nicholson Tel: 403.571.1053 Email: nicholsonc@jssbarristers.ca</p>

<p>BLANEY McMURTRY LLP Barristers and Solicitors Suite 1500 - 2 Queen Street East Toronto, ON M5C 3G5</p> <p>Counsel for PJM Interconnection, L.L.C. and PJM Settlement, Inc.</p>	<p>Mervyn D. Abramowitz Tel: 416.5974887 Email: mabramowitz@blaney.com</p> <p>Eric Golden Tel: 416.593.3927 Email: egolden@blaney.com</p>
<p>SCHNADER HARRISON SEGAL & LEWIS LLP 1600 Market Street, Suite 3600 Philadelphia, PA 19103-7286 U.S.A.</p> <p>U.S. counsel for PJM Interconnection, L.L.C. and PJM Settlement, Inc.</p>	<p>Nicholas J. LePore, III Tel: 215.751.2286 Email: nlepore@schnader.com</p> <p>Richard A. Barkasy Tel: 215.751.2526 Email: rbarkasy@schnader.com</p>
<p>GOODMANS LLP Bay Adelaide Centre 333 Bay Street, Suite 3400 Toronto, ON M5H 2S7</p> <p>Counsel for ICE NGX Canada Inc.</p>	<p>Brian F. Empey Tel: 416.597.4194 Email: bempey@goodmans.ca</p>
<p>PUBLIC UTILITIES COMMISSION OF NEVADA 1150 East William Street Carson City, NV 89701 U.S.A.</p>	<p>David Noble Assistant Staff Counsel Tel: 775.684.6194 Email: davidnoble@puc.nv.gov</p> <p>Don Lomoljo Staff Counsel Email: dlomoljo@puc.nv.gov</p>

<p>LIPMAN, ZENER & WAXMAN PC 100 Sheppard Avenue East, Suite 850 Toronto, ON M2N 6N5</p> <p>Fax: 416.789-9015</p> <p>Lawyers for the Creditor, Jordan Hutchinson</p>	<p>Anthony J. O'Brien Tel: 416.789.0656 Email: tobrien@lzwlaw.com</p>
<p>ENERGY BANK INCORPORATED 4466 Custer Street Manitowoc, Wisconsin 54220</p> <p>Fax: 920.682.6228</p>	<p>Becky Verfuert Manager-operations Tel: 920.682.6220 Email: bm@energybankinc.com</p>
<p>ELEVATION ENERGY GROUP 2305 E. Cesar Chavez Austin, Texas 78702</p> <p>Fax: 866.593.9771</p>	<p>Ben Huff Tel: 317.333.7281 Email: ben.huff@elevationeg.com</p>
<p>EMPIRE AR MANAGEMENT INC. 365 Evans Ave, Suite#L5 Toronto, ON M8Z 1K2</p> <p>Fax: 416.734.0006</p>	<p>Michael Biasiucci President Tel: 416.303.2663 Email: michael.b@empirearmi.com</p>

<p>AMERICAN CAPITAL RECOVERY LLC 5220 Spring Valley Road Suite 408 Dallas, TX 75254</p> <p>Fax: 972.661.2504</p>	<p>Paul Fagan Email: paul.fagan@amcapr.com</p>
<p>LECKER & ASSOCIATES Hullmark Corporate Centre 4789 Yonge St., Suite 514 Toronto, ON M2N 0G3</p> <p>Fax: 416.223.9492</p> <p>Counsel for John Roche and Hampstead Company</p>	<p>Ian D. Hurley Tel: 416.223.5391, ext. 325 E-mail: ihurley@leckerslaw.com</p> <p>Tina Yaghoubi Email: tina@leckerslaw.com</p>
<p>CDW CANADA 1700-185 The West Mall Etobicoke, ON M9C 5L5</p>	<p>Maribeth Halls Accounts Receivable Manager Email: Maribeth.Halls@cdw.ca</p>
<p>ATTORNEY GENERAL OF CANADA DEPARTMENT OF JUSTICE Ontario Regional Office, Tax Law Section 120 Adelaide Street West, Suite 400 Toronto, Ontario M5H 1T1</p> <p>Fax: 416.973.0810</p> <p>Attorney General of Canada on behalf of Her Majesty the Queen in Right of Canada as represented by the Minister of National Revenue</p>	<p>Diane Winters General Counsel Email: diane.winters@justice.gc.ca</p>

<p>HER MAJESTY IN RIGHT OF ONTARIO REPRESENTED BY THE MINISTER OF FINANCE - INSOLVENCY UNIT Ontario Ministry of Finance – Legal Services Branch 11-777 Bay Street Toronto, ON M5G 2C8</p> <p>Fax: 416.325.1460</p>	<p>Leslie Crawford Email: leslie.crawford@ontario.ca</p> <p>Copy to: Email: insolvency.unit@ontario.ca</p>
<p>CANADA REVENUE AGENCY 1 Front Street West Toronto, ON M5J 2X6</p> <p>Fax: 416.964.6411</p>	<p>Pat Confalone Tel: 416.954.6514 Email: pat.confalone@cra-arc.gc.ca</p>
<p>MINISTRY OF FINANCE (ALBERTA) The Tax and Revenue Administration 9811 – 109 Street Edmonton, AB T5K 2L5</p>	<p>Travis Toews Minister Tel: 780.427.2711 Email: tbf.minister@gov.ab.ca</p> <p>Grant Hunter Associate Minister Tel: 780 427-0240 Email: associateminister-rtr@gov.ab.ca</p>
<p>LOGIX COMMUNICATIONS LOGIX FIBER NETWORKS 2950 North Loop West Houston, TX 77092 Tel: 800.999.8105</p>	<p>Emails: Monique.Sampson@Logix.com Credit@Logix.com tonie.bloomingberg@logix.com</p>

<p>CHAITONS LLP 5000 Yonge Street, 10th Floor Toronto, ON M2N 7E9</p> <p>Counsel for Elevation Energy Group, LLC</p>	<p>Harvey Chaiton Tel: 416.218.1129 Email: harvey@chaitons.com</p>
<p>CBTS TECHNOLOGY SOLUTIONS LLC 221 East Fourth Street Cincinnati, OH 45202</p>	<p>Don Verdon Director - Compliance Tel: 513.484.6775 Email: Don.Verdon@cbts.com</p>
<p>COMPUTERSHARE TRUST COMPANY OF CANADA 100 University Avenue, 11th Floor Toronto, ON M5J 2Y1</p> <p>Fax: 416.981.9777</p> <p>Indenture Trustee under a Trust Indenture dated September 28, 2020</p> <p>COMPUTERSHARE TRUST COMPANY OF CANADA 1500 Robert-Bourassa Boulevard, 7th Floor Montreal, Quebec H3A 3S8</p> <p>Fax: 514.982.7677</p>	<p>Yana Nedyalkova, J.D. Corporate Trust Officer, Corporate Trust Tel: 416.263.9559 Email: Yana.Nedyalkova@computershare.com</p> <p>John Poolman Counsel Email: John.Poolman@computershare.com</p> <p>Jonathan Champoux Cadoche Corporate Trust Officer, Corporate Trust Services Tel: 514.982.7632</p> <p>Email: Jonathan.ChampouxCadoche@computershare.com</p>

<p>MILLER THOMSON LLP Pacific Centre, 400 – 725 Granville Street Vancouver, BC V7Y 1G5</p> <p>Fax: (604) 643-1200</p> <p>Scotia Plaza 40 King Street West, Suite 5800 P.O. Box 1011 Toronto, ON M5H 3S1</p> <p>Fax: (416) 595-8695</p> <p>Counsel for Computershare Trust Company as Indenture Trustee</p>	<p>Mike Weinczok Tel: (604) 628-3684 Tel: (416) 595-8530 (DL – Toronto) Email: mweinczok@millerthomson.com</p>
<p>WILD GOOSE STORAGE LLC 400 - 607 8th Ave SW Calgary, AB T2P 0A7</p>	<p>James Bartlett Legal Counsel Tel: 403.513.8680 Email: james.bartlett@rockpointgs.com</p>
<p>ENERGY OPTIMIZATION SERVICES LTD. c/o Strategic Group Suite 400, Strategic Centre 630 - 8 Ave SW Calgary AB T2P 1G6</p> <p>Tel. (main): 403.770.2300 Fax: 403.770.2289</p>	<p>Beamer Comfort General Counsel Tel: 587.747.0360 Email: bcomfort@strategicgroup.ca</p> <p>Jayne Gradishar Litigation Paralegal Tel: 403.770.2294 Email: jgradishar@strategicgroup.ca</p>

<p>LANIER PARKING SOLUTIONS c/o Lincoln Property Company 5333 Westheimer Rd., Suite 850 Houston, TX 77056</p> <p>Tel: 713.960.1713</p>	<p>Lillie L. Norton Sr. Property Manager Tel. 713.766.7487 Email: lnorton@lpc.com</p> <p>Brooke Caravela Assistant Property Manager Email: bcaravela@LPC.com</p>
<p>FOGLER, RUBINOFF LLP 77 King Street West Suite 3000, P.O. Box 95 TD Centre North Tower Toronto, ON M5K 1G8</p> <p>Tel (main): 416.864.9700 Fax: 416.941.8852</p> <p>Counsel for Binnj Inc.</p>	<p>Robert B. Macdonald Tel: 647.729.0754 Email: rmacdonald@foglers.com</p>
<p>DICKINSON WRIGHT LLP Barristers & Solicitors 199 Bay Street Suite 2200, P.O. Box 447 Commerce Court Postal Station Toronto, ON M5L 1G4</p> <p>Counsel for Sitel Operating Corporation</p>	<p>John D. Leslie Tel: 416.646.4603 Email: jleslie@dickinsonwright.com</p> <p>Lisa S. Corne Tel: 416.646-4608 Email: lcorne@dickinsonwright.com</p>
<p>BORDEN LADNER GERVAIS LLP 1000 de la Gauchetière West, Suite 900 Montréal, QC H3B 5H4</p> <p>Counsel for Bell Canada</p>	<p>Gabrielle Tremblay Tel: 514.954.2560 Email: gtremblay@blg.com</p>

<p>CAMELINO GALESSIERE LLP Barristers & Solicitors 6 Adelaide St. E., Suite 220 Toronto, Ontario, M5C 1H6</p> <p>Fax: (416) 306-3820</p> <p>Counsel for Brookfield Properties (PI) Inc.</p>	<p>Linda Galessiere Tel: (416) 306-3827 Email: lgalessiere@cglegal.ca</p> <p>Jessica Wuthmann Tel: (416) 306-3827 Email: jwuthmann@cglegal.ca</p>
<p>MINDEN GROSS LLP 2200 - 145 King Street West Toronto, ON M5H 4G2</p> <p>Fax: (416) 864-9223</p> <p>Counsel for Hoop Realty Inc. and Landlord of 80 Courtney Park Drive, Mississauga, Ontario</p>	<p>Timothy R. Dunn Tel: (416) 369-4335 Email: tdunn@mindengross.com</p> <p>Stephen Skorbinski Tel: (416) 369-4286 Email: sskorbinski@mindengross.com</p>
<p>SILVERCREEK MANAGEMENT INC. 1670 Bayview Avenue, Suite 308 Toronto, ON M4G 3C2</p> <p>Fax: (416) 485-0640</p>	<p>Louise Morwick, <i>President</i> Tel: (416) 485-7797 Email: lmorwick@silvercreekmanagement.com</p> <p>Bryn Joynt, <i>Vice President</i> Email: bjoynt@silvercreekmanagement.com</p>
<p>DLA PIPER (CANADA) LLP Suite 2800, Park Place 666 Burrard St. Vancouver, BC V6C 2Z7</p> <p>Fax: (604) 605-4875</p> <p>Counsel for FortisBC Energy Inc.</p>	<p>Colin D. Brousson Tel: (604) 643-6400 Email: colin.brousson@dlapiper.com</p>

<p>WeirFoulds LLP 4100 - 66 Wellington St. W. PO Box 35, TD Bank Tower Toronto, ON M5K 1B7</p> <p>Fax: (416) 365-1876</p> <p>Counsel for Microsoft</p>	<p>Philip Cho Tel: (416) 619-6296 Email: pcho@weirfoulds.com</p> <p>Macdonald Allen Tel: (416) 947-5027 Email: mallen@weirfoulds.com</p>
<p>CRABTREE LAW 1018-650 West Georgia Street Vancouver, BC V6B 4N8</p> <p>Counsel for Amazon Web Services, Inc.</p>	<p>Andrew Crabtree Tel: (778) 242-6797 Email: andrew@crabtreelaw.ca</p>
<p>NIXON PEABODY LLP 70 W. Madison Street Suite 3500 Chicago, IL 60602-4224</p> <p>Fax: 1 (844) 566-1442</p> <p>Counsel for TR Galleria Place Corp. (landlord)</p>	<p>R. Scott Alsterda Tel: (312) 977-9203 Email: rsalsterda@nixonpeabody.com</p>
<p>STREUSAND, LANDON, OZBURN & LEMMON, LLP 1801 S. MoPac Expressway Suite 320 Austin, TX 78746</p> <p>Fax: (512) 236-9904</p> <p>Counsel for Dell Financial Services LLC</p>	<p>Sabrina L. Streusand Tel: (512) 236-9901 Email: streusand@slollp.com</p>

<p>Mr. Jordan Steiner (on behalf of shareholders) LionGuard Capital Management 1010 rue Sherbrooke Ouest, Bureau 2350 Montréal, QC H3A 2R7</p>	<p>c/o Jordan Steiner, CFA Portfolio Manager Email: jsteiner@lionguardcapital.com</p>
<p>ALVAREZ & MARSAL DSIPUTES AND INVESTIGATIONS, LLC 700 Louisiana St, Suite 3300 Houston, TX 77002</p> <p>ALVAREZ & MARSAL 600 Madison Ave, 8th Floor New York, NY 10022</p>	<p>Ben Edmiston, CPA, CFE Senior Director Tel: 1 (713) 547-3696 Email: bedmiston@alvarezandmarsal.com</p> <p>Scott R. Coleman General Counsel - Operating Companies Email: scoleman@alvarezandmarsal.com</p>
<p>OFFICE OF THE WEST VIRGINIA ATTORNEY GENERAL State Capital Complex Building 1, Room W-435 Charleston, WV 25305</p>	<p>Elizabeth Baker Assistant Attorney General Tel: 1 (304) 558-2522 Email: beth.baker@wvago.gov</p>
<p>BLAKE, CASSELS & GRAYDON LLP Barristers and Solicitors 199 Bay Street Suite 4000, Commerce Court West Toronto, ON M5L 1A9</p> <p>Fax: (416) 863-2653</p> <p>Counsel for WNS North America Inc.</p>	<p>Chris Burr Tel: (416) 863-3261 Email: chris.burr@blakes.com</p>

<p>KELLEY DRYE & WARREN LLP 3 World Trade Centre 175 Greenwich Street New York, NY 10007</p> <p>Counsel for WNS North America Inc.</p>	<p>Eloy Peral Tel: 1 (212) 808-7945 Email: eperal@kelleydrye.com</p>
<p>GOWLING WLG (Canada) LLP One Main Street West Hamilton, ON L8P 4Z5</p> <p>Fax: (905) 528-5833</p> <p>Counsel for EXL Services Holdings, Inc.</p>	<p>Emma Dalziel Tel: (905) 540-2477 Email: emma.dalziel@gowlingwlg.com</p>
<p>BENNETT JONES LLP One First Canadian Place Suite 3400, P.O. Box 130 Toronto, ON M5X 1A4</p> <p>Fax: (416) 863-1716</p> <p>Special Litigation Counsel to Shell Energy North America (US), L.P.</p>	<p>Kevin Zych Email: zychk@bennettjones.com</p> <p>Richard Swan Email: swanr@bennettjones.com</p> <p>Preet Bell Email: bellp@bennettjones.com</p> <p>Joshua Foster Email: fosterj@bennettjones.com</p> <p>Tel: (416) 863-1200</p>

<p>METZ LEWIS BRODMAN MUST O'KEEFE LLC 535 Smithfield St., Suite 800 Pittsburgh, PA 15222 U.S.A.</p> <p>Fax: 1 (412) 918-1199</p> <p>Counsel for National Fuel Gas Distribution Corp. and various affiliates thereof</p> <p>Copy to:</p> <p>NATIONAL FUEL GAS DISTRIBUTION CORPORATION 6363 Main Street Williamsville, NY 14221 U.S.A.</p> <p>Fax: 1 (716) 857-7206</p>	<p>John R. O'Keefe, Jr. Tel: 1 (412) 918-1133 Email: jokeefe@metzlewis.com</p> <p>Nicholas A. Didomenico Tel: 1(412)918-1155 Email: ndidomenico@metzlewis.com</p>
<p>RATELLE 481, rue de Lanaudière Joliette, QC J6E 3M3</p> <p>Fax: (450) 755-2170</p> <p>Counsel to Asphalte Générale Inc.</p>	<p>Thomas Roussy Tel: (450) 759-5151 Email: thomas.roussy@avocatsratelle.com</p>
<p>KANE RUSSELL COLEMAN LOGAN PC 901 Main Street, Suite 5200 Dallas, Texas 75202</p> <p>Fax: (214) 777-4299</p> <p>Counsel to Pariveda Solutions Inc.</p>	<p>S. Kyle Woodard Tel: (214) 777-4200 Email: kwoodard@krcl.com</p>

<p>BLAKE, CASSELS & GRAYDON LLP 199 Bay Street, Suite 4000 Commerce Court West Toronto, ON M5L 1A9</p> <p>Counsel to JPMorgan Chase Bank, N.A.</p>	<p>Linc Rogers Tel: (416) 863-4168 Email: linc.rogers@blakes.com</p> <p>Alexia Parente Tel: (416) 863-2417 Email: alexia.parente@blakes.com</p>
<p>DUNDON ADVISERS LLC 440 Mamaroneck Avenue, Fifth Floor Harrison, NY 10528 USA</p> <p>Fax: 1 (212) 202-4437</p> <p>Copy to:</p> <p>TYR LLP 488 Wellington Street West Suite 300-302 Toronto, ON M5V 1E3</p>	<p>Matthew Dundon Tel: 1 (917) 838-1930 Email: md@dundon.com</p> <p>Eric Reubel Tel: 1 (917) 626-4051 Email: er@dundon.com</p> <p>Copy to:</p> <p>Jason Wadden Tel: (416) 627-9815 Email: jwadden@tyrllp.com</p>
<p>FINKELSTEIN, BLANKINSHIP, FREI-PEARSON & GARBER, LLP One North Broadway, Suite 900 White Plains, NY 10601 Tel: (914) 298-3290</p> <p>SHUB LAW FIRM LLC 134 Kings Highway East, 2nd Floor Haddonfield, NJ 08033 Tel: (856) 772-7200</p> <p>US Counsel for Trevor Jordet, in his capacity as proposed class representative in <i>Jordet v. Just Energy Solutions Inc.</i></p> <p>STOCKWOODS LLP Barristers Toronto-Dominion Centre TD North Tower, Box 140 77 King Street West, Suite 4130 Toronto, ON M5K 1H1</p>	<p>Greg Blankinship Tel: (914) 298-3290 Email: gblankinship@fbfglaw.com</p> <p>Jonathan Shub Email: jshub@shublawyers.com</p> <p>Kevin Laukaitis Email: klaukaitis@shublawyers.com</p> <p>Stephen Aylward Tel: (416) 593-2496 Email: stephena@stockwoods.ca</p>

<p>Agent for US Counsel for Trevor Jorget</p>	
<p>WITTELS MCINTURFF PALIKOVIC 18 Half Mile Road Armonk, NY 10504 Tel: (914) 775-8862</p> <p>Fax: (914) 273-2563</p> <p>US Counsel for Fira Donin and Inna Golovan, in their capacity as proposed class representatives in <i>Donin et al. v. Just Energy Group Inc. et al.</i></p> <p>STOCKWOODS LLP Barristers Toronto-Dominion Centre TD North Tower, Box 140 77 King Street West, Suite 4130 Toronto, ON M5K 1H1</p> <p>Agent for US Counsel for Fira Donin and Inna Golovan</p>	<p>Steven L. Wittels Tel: (914) 775-8862 Email: slw@wittelslaw.com</p> <p>J. Burkett McInturff Tel: (910) 476-7253 Email: jbm@wittelslaw.com</p> <p>Steven D. Cohen Tel: (914) 775-8862 ext 109 Email: sdc@wittelslaw.com</p> <p>Stephen Aylward Tel: (416) 593-2496 Email: stephena@stockwoods.ca</p>
<p>PALIARE ROLAND ROSENBERG ROTHSTEIN LLP 155 Wellington Street West, 35th Floor Toronto, ON M5V 3H1 Tel: (416) 646-4300</p> <p>Fax: (416) 646-4301</p> <p>Counsel to US counsel for Fira Donin and Inna Golovan, in their capacity as proposed class representatives in <i>Donin et al. v. Just Energy Group Inc. et al.</i></p>	<p>Ken Rosenberg Tel: (416) 646-4304 Email: ken.rosenberg@paliareroland.com</p> <p>Jeffrey Larry Tel: (416) 646-4330 Email: jeff.larry@paliareroland.com</p> <p>Danielle Glatt Tel: (416) 646-7440 Email: danielle.glatt@paliareroland.com</p>

<p>Counsel to US Counsel for Trevor Jordet, in his capacity as proposed class representative in <i>Jordet v. Just Energy Solutions Inc.</i></p>	
<p>AMERICAN EXPRESS World Financial Center 200 Vesey St. New York, NY 10285-1000</p>	<p>Ina Thonfeld Tel: 1 (212) 640-2216 Email: ina.thonfeld@aexp.com</p> <p>Matthew Heimann Tel: 1 (908) 208-9438 Email: matthew.heimann@aexp.com</p>
<p>AMERICAS CORE CREDIT - Reorg 11 East 26th Street, 12th Floor New York, NY 10010</p> <p>(212) 588-8890</p>	<p>Bri Bilter Email: bbilter@reorg.com</p>
<p>STIKEMAN ELLIOTT LLP 4300 Bankers Hall West 888 - 3rd Street S.W. Calgary, AB T2P 5C5</p> <p>Fax: (403) 266-9034</p> <p>Counsel for Alectra Utilities Corporation</p>	<p>Karen Fellowes, Q.C. Tel: (403) 724-9469 (Calgary) (604) 631-1468 (Vancouver) Email: kfellowes@stikeman.com</p>

<p>SULAIMAN LAW GROUP, LTD. 2500 South Highland Ave., Suite 200 Lombard, Illinois 60148</p> <p>Fax: 1 (630) 575-8188</p> <p>Counsel for the Plaintiff in <i>Williams v. Fulcrum Retail Energy LLC</i> (Case No. 3:22-cv-00460-S, U.S. District Court – Northern District of Texas)</p>	<p>Nathan C. Volheim Tel: 1 (630) 568-3056 Email: nvolheim@sulaimanlaw.com</p> <p>Eric D. Coleman Email: ecoleman@sulaimanlaw.com</p> <p>Alejandro E. Figueroa Email: alejandrof@sulaimanlaw.com</p>
<p>TORYS LLP 79 Wellington St. W., Suite 3000 Box 270, TD Centre Toronto, ON M5K 1N2</p> <p>Fax: (416) 865-7380</p> <p>Counsel to Calpine Corporation</p>	<p>Adam M. Slavens Tel: (416) 865-7333 Email: aslavens@torys.com</p> <p>Mike Noel Tel: (416) 865-7378 Email: mnoel@torys.com</p>

PPSA REGISTRANTS

<p>ICE NGX CANADA INC. 225 6th Avenue SW, Suite 2610 Calgary, AB</p>	<p>Email: maggie.xu@theice.com</p> <p>Copy to:</p> <p>Email: Operations-ICENGX-Clearing@TheIce.com</p>
<p>CISCO SYSTEMS CAPITAL CO. 170 West Tasman Drive San Jose, CA 95134</p>	<p>Email: csc-america-notice@cisco.com</p>
<p>WELLS FARGO EQUIPMENT FINANCE COMPANY 1290 Central Parkway West, Suite 1100 Mississauga, ON L5C 4R3</p> <p>Fax: 416.498.9240</p>	
<p>HEWLETT-PACKARD FINANCIAL SERVICES CANADA COMPANY 5150 Spectrum Way 3rd Fl Mississauga, ON, L4W 5G1</p>	

<p>ENBRIDGE GAS INC. 500 Consumers Road Toronto, ON M2J 1P8</p> <p>Fax: 416.495.5994</p> <p>ENBRIDGE GAS INC. Suite 200, 425 1st Street SW Fifth Avenue Place, East Tower Calgary, AB T2P 3L8</p>	<p>Armanda Pinho Associate General Counsel Tel: 416.428.8944 Email: Armanda.pinho@enbridge.com</p> <p>Joseph Marra Senior Legal Counsel Tel: 403.612.5117 Email: Joseph.marra@enbridge.com</p> <p>Rob DiMaria Tel: 416.523.9629 Email: Rob.DiMaria@enbridge.com</p> <p>Shawn McClacherty Tel: 519.365.8945 Email: Shawn.McClacherty@enbridge.com</p> <p>Terry Laframboise Tel: 519.567.3587 Email: Terry.Laframboise@enbridge.com</p> <p>Amir Hasan Tel: (416) 450 0253 Email: Amir.Hasan@enbridge.com</p>
<p>XEROX CANADA LTD. 20 York Mills Rd #5 North York, ON M2P 2C2</p>	

<p>CANADIAN IMPERIAL BANK OF COMMERCE 199 Bay Street, Commerce Court Toronto, ON, CA, M5L 1A2</p> <p>Fax: 416.980.7012</p>	<p>Email: wendy.maragh@cibc.com</p>
---	--

Email List:

MWasserman@osler.com; MDeLellis@osler.com; JDacks@osler.com; SIrving@osler.com;
DRosenblat@osler.com; brian.schartz@kirkland.com; mary.kogut@kirkland.com;
neil.herman@kirkland.com; paul.bishop@fticonsulting.com; jim.robinson@fticonsulting.com;
rthornton@tgf.ca; rnicholson@tgf.ca; pfesharaki@tgf.ca; rkennedy@tgf.ca;
tdemarinis@torys.com; hmeredith@mccarthy.ca; jgage@mccarthy.ca; jlapedus@mccarthy.ca;
dlynde@mccarthy.ca; stetro@chapman.com; mmreed@chapman.com;
howard.gorman@nortonrosefulbright.com; rjacobs@cassels.com; jdietch@chappell.com;
mwunder@cassels.com; daniel.sylvester@hkclaw.com; dbotter@akingump.com;
aqureshi@akingump.com; zwittenberg@akingump.com; cnichols@akingump.com;
aloring@akingump.com; howard.gorman@nortonrosefulbright.com;
ryan.manns@nortonrosefulbright.com; david.mann@dentons.com;
robert.kennedy@dentons.com; patrick.hughes@haynesboone.com;
kelli.norfleet@haynesboone.com; Patrick.Woodhouse@constellation.com;
Bill.SCHNURR@brucepower.com; Sandra.MEYER@brucepower.com;
Gerald.Nemec@edfenergyna.com; Frank.Smejkal@edfenergyna.com;
ELLIOT.BONNER@nexteraenergy.com; Allison.Ridder@nexteraenergy.com;
FICC.notices@macquarie.com; FICClegalHouston@Macquarie.com;
FICClegalHouston@Macquarie.com; FICClegalHouston@Macquarie.com;
msloanservicing@morganstanley.com; commission.secretary@bcuc.com; info@aeso.ca;
Chun.Seto@aeso.ca; scott.hood@gov.ab.ca; jp.mousseau@auc.ab.ca;
RetailerContact@atcogas.com; regulatory@apexutilities.ca; brpc@brpower.coop;
gloria@fortmacleod.com; admin@fortmacleod.com; sharon.wong@fortisalberta.com;
gas.regulatory.affairs@fortisbc.com;
electricity.regulatory.affairs@fortisbc.com; cglazer@equs.ca; utilities@ponoka.ca;
utilities@crownsnestpass.com; fcaa@gov.sk.ca; Rachel.McMillin@gov.mb.ca;
Kristen.Schubert@gov.mb.ca; publicutilities@gov.mb.ca; dmartin@hydro.mb.ca;
BACzarnecki@hydro.mb.ca; cdfoulkes@hydro.mb.ca; registrar@oeb.ca;
peggy.lund@algomapower.com; regulatoryaffairs@fortisontario.com; info@athydro.com;
jen.wiens@athydro.com; kgadsby@bluewaterpower.com; regulatory@bluewaterpower.com;
regulatoryaffairs@energyplus.ca; regulatory@brantford.ca;
regulatoryaffairs@burlingtonhydro.com; regulatoryaffairs@energyplus.ca;
regulatoryaffairs@fortisontario.com; regulatory@cwhydro.ca; chec@onlink.net;
jcyr.puc@chappleau.ca; onreg.electricity@epcor.com; benoit@hydroembrun.ca;
emuscat@enersource.com; regulatoryaffairs@alecrautilities.com; Tracy.Manso@entegrus.com;
regulatory@entegrus.com; ana.couto@entegrus.com; retailerrelations@enwin.com;
regulatory@enwin.com; oeb@eriethamespower.com; jbarile@essexpowerlines.ca; info@ffpc.ca;
jodiek@shcc.com; regulatoryaffairs@gsuinc.ca; regulatoryaffairs@grimsbypower.com;
christina.koren@alecrautilities.com; regulatoryaffairs@alecrautilities.com;
paul.harricks@hydroone.com; tracyr@haltonhillshydro.com; jrichard@hearstpower.com;
regulatoryaffairs@alecrautilities.com; lisewilkinson@hydro2000.ca;
service@hydrohawkesbury.ca; regulatory@hydroone.com;
regulatoryaffairs@alecrautilities.com; regulatoryaffairs@hydroottawa.com;
regulatoryaffairs@innpower.ca; jrobertson@kenora.ca; regulatory@synergynorth.ca;
rmurphy@utilitieskingston.com; regulatory@kingstonhydro.com; jvanooteghem@kwhydro.ca;
dpaul@lusi.on.ca; regulatory@lusi.on.ca; sshipston@lakelandpower.on.ca;
regulatory-affairs@lakelandpower.on.ca; regulatoryaffairs@londonhydro.com;

chuma@midlandpuc.on.ca; regulatory@nmhydro.ca; igor.rusic@miltonhydro.com;
regulatory@miltonhydro.com; tcurtis@notlhydro.com; Margaret.battista@npei.ca;
regulatory@hydroone.com; gsauve@northbayhydro.com; sbomhof@torys.com;
regulatoryaffairs@northbayhydro.com; sandras@nowinc.ca; regulatory@nowinc.ca;
mwilson@oakvillehydro.com; regulatoryaffairs@oakvillehydro.com;
regulatoryaffairs@orangevillehydro.on.ca; phurley@orilliapower.ca;
regulatory@hydroone.com; sbeckstead@opuc.on.ca; regulatory.affairs@opuc.on.ca;
jallen@orpowercorp.com; Regulatory-affairs@lakelandpower.on.ca;
jstephenson@peterboroughutilities.ca; regulatory@hydroone.com;
regulatoryaffairs@alecrautilities.com; Jennifer.uchmanowicz@ssmpuc.com;
regulatory@ssmpuc.com; regulatory@renfrewhydro.com; jwalsh@rslu.ca; slhydro@tbaytel.net;
dkulchyski@siouxlookouthydro.com; regulatory@entegrus.com; regulatory@nmhydro.ca;
twilson@tbhydro.on.ca; regulatory@synergynorth.ca; rbaichan@tillsonburg.ca;
epage@torontohydro.com; regulatoryaffairs@torontohydro.com;
llombardi@elexiconenergy.com; d.stavinga@wasagadist.ca; retinfo@wnhydro.com;
porosz@wellandhydro.com; rbucknall@wellingtonnorthpower.com;
oeb@erithamespower.com; Malcolm.McCallum@westario.com; sreffle@whitbyhydro.on.ca;
llombardi@elexiconenergy.com; regulatory@hydroone.com; KU-sups@kitchener.ca;
ntaylor@utilitieskingston.com; info@energir.com; ESHARIE@travelers.com;
Howard.uniman@zurichna.com; wendy.maragh@cibc.com; maggie.xu@theice.com;
csc-america-notice@cisco.com; Shakeel.Arshed@enbridge.com;
RetailerServices@atcoelectric.com Knox.Davidson@atco.com; jerickson@osler.com;
EPaplawski@osler.com; Michael.Strohmeier@constellation.com; peter.bychawski@blakes.com;
JHiggins@porterhedges.com; Armanda.pinho@enbridge.com; Joseph.marra@enbridge.com;
Rob.DiMaria@enbridge.com; Shawn.McClacherty@enbridge.com;
Terry.Laframboise@enbridge.com; Amir.Hasan@enbridge.com; tyler.planeta@siskinds.com;
michael.robb@siskinds.com; ap@complexlaw.ca; ckbh@complexlaw.ca; jmaclellan@blg.com;
bbrooksbank@blg.com; tushara.weerasooriya@mcmillan.ca; shahen.mirakian@mcmillan.ca;
stephen.brown-okruhlik@mcmillan.ca; TCrotty-Wong@epcor.com; legaldeptinqu@epcor.com;
Credit@ATCO.com; Brian.Loewen@lethbridge.ca; victor.buza@ieso.ca; michael.lyle@ieso.ca;
kenneth.kraft@dentons.com; gord.tarnowsky@dentons.com; mark.freake@dentons.com;
arsalan.muhammad@haynesboone.com; HaneyS1@michigan.gov; EGoldstein@goodwin.com;
JSignor@goodwin.com; bankruptcy@goodwin.com; NelmsA@bennettjones.com;
klozynsk@apexutilities.ca; phillip.nelson@hklaw.com; MNanninga@KWHydro.ca;
jshaffer@longviewcomms.ca; berman@longviewcomms.ca; pblock@longviewcomms.ca;
nrambaran@mccarthy.ca; drosenfeld@kmlaw.ca; jharnum@kmlaw.ca; aziaie@kmlaw.ca;
Virginie.Gauthier@gowlingwlg.com; pcorney@wfklaw.ca; sweisz@wfklaw.ca;
nicholsonc@jssbarristers.ca; mabramowitz@blaney.com; egolden@blaney.com;
kelly.bourassa@blakes.com; aneil@hydro.mb.ca; bempey@goodmans.ca;
nlepore@schnader.com; rbarkasy@schnader.com; mkonyukhova@stikeman.com;
davidnoble@puc.nv.gov; dlomoljo@puc.nv.gov; tobrien@lzwlaw.com;
bmv@energybankinc.com; ben.huff@elevationeg.com; dmichaud@kwhydro.ca;
michael.b@empirearmi.com; diane.winters@justice.gc.ca; leslie.crawford@ontario.ca;
insolvency.unit@ontario.ca;
paul.fagan@amcapr.com; ihurley@leckerslaw.com; tina@leckerslaw.com;
Maribeth.Halls@cdw.ca; pat.confalone@cra-arc.gc.ca; tbf.minister@gov.ab.ca;
associateminister-rtr@gov.ab.ca; Monique.Sampson@Logix.com; Credit@Logix.com;
tonie.bloomingberg@logix.com; harvey@chaitons.com; Don.Verdon@cbts.com;

Yana.Nedyalkova@computershare.com; John.Poolman@computershare.com;
Jonathan.ChampouxCadoche@computershare.com;
james.bartlett@rockpointgs.com; bcomfort@strategicgroup.ca; jgradishar@strategicgroup.ca;
lnorton@lpc.com; bcaravela@LPC.com; mengelberg@HydroOne.com;
rmacdonald@foglers.com; jleslie@dickinsonwright.com; lcorne@dickinsonwright.com;
gtremblay@blg.com; lgalessiere@clegal.ca; jwuthmann@clegal.ca; tdunn@mindengross.com;
sskorbinski@mindengross.com; lmorwick@silvercreekmanagement.com;
bjoynt@silvercreekmanagement.com; colin.brousson@dlapiper.com; pcho@weirfoulds.com;
mallen@weirfoulds.com; andrew@crabtreelaw.ca; rsalsterda@nixonpeabody.com;
streusand@slollp.com; michael.schafler@dentons.com; jsteiner@lionguardcapital.com;
bedmiston@alvarezandmarsal.com; beth.baker@wvago.gov; chris.burr@blakes.com;
eperal@kelleydrye.com; emma.dalziel@gowlingwlg.com; scoleman@alvarezandmarsal.com;
zychk@bennettjones.com; swanr@bennettjones.com; bellp@bennettjones.com;
fosterj@bennettjones.com; thomas.roussy@avocatsratelle.com; kwoodard@krcl.com;
linc.rogers@blakes.com; Operations-ICENGX-Clearing@TheIce.com; md@dundon.com;
er@dundon.com; mwinchester@festivalhydro.com; grahamj@festivalhydro.com;
blaborie@bridgehouselaw.ca; stephena@stockwoods.ca; gblankinship@fbfglaw.com;
jshub@shublawyers.com; klaukaitis@shublawyers.com; slw@wittelslaw.com;
jbm@wittelslaw.com; sdw@wittelslaw.com; jbello@wittelslaw.com; jbellissimo@cassels.com; jdavids@justenergy.com;
mcarter@justenergy.com; jeff.larry@paliareroland.com; ken.rosenberg@paliareroland.com;
ina.thonfeld@aexp.com; matthew.heimann@aexp.com; alexia.parente@blakes.com;
amerskey@cassels.com; jpicone@cassels.com; ceslby@cassels.com; jbornstein@cassels.com;
bbilter@reorg.com; danielle.glatt@paliareroland.com; mcasson@northbayhydro.com;
gsauve@northbayhydro.com; kfellows@stikeman.com; nvolheim@sulaimanlaw.com;
ecoleman@sulaimanlaw.com; alejandrof@sulaimanlaw.com; jwadden@tyrllp.com;
mweinczok@millertomson.com; apappas@burlingtonhydro.com; jokeefe@metzlewis.com;
ndidomenico@metzlewis.com; aslavens@torys.com; mnoel@torys.com;

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985,
c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF JUST ENERGY GROUP INC., JUST ENERGY CORP., ONTARIO ENERGY COMMODITIES INC., UNIVERSAL ENERGY CORPORATION, JUST ENERGY FINANCE CANADA ULC, HUDSON ENERGY CANADA CORP., JUST MANAGEMENT CORP., 11929747 CANADA INC., 12175592 CANADA INC., JE SERVICES HOLDCO I INC., JE SERVICES HOLDCO II INC., 8704104 CANADA INC., JUST ENERGY ADVANCED SOLUTIONS CORP., JUST ENERGY (U.S.) CORP., JUST ENERGY ILLINOIS CORP., JUST ENERGY INDIANA CORP., JUST ENERGY MASSACHUSETTS CORP., JUST ENERGY NEW YORK CORP., JUST ENERGY TEXAS I CORP., JUST ENERGY, LLC, JUST ENERGY PENNSYLVANIA CORP., JUST ENERGY MICHIGAN CORP., JUST ENERGY SOLUTIONS INC., HUDSON ENERGY SERVICES LLC, HUDSON ENERGY CORP., INTERACTIVE ENERGY GROUP LLC, HUDSON PARENT HOLDINGS LLC, DRAG MARKETING LLC, JUST ENERGY ADVANCED SOLUTIONS LLC, FULCRUM RETAIL ENERGY LLC, FULCRUM RETAIL HOLDINGS LLC, TARA ENERGY, LLC, JUST ENERGY MARKETING CORP., JUST ENERGY CONNECTICUT CORP., JUST ENERGY LIMITED, JUST SOLAR HOLDINGS CORP. AND JUST ENERGY (FINANCE) HUNGARY ZRT.

Applicants

Index

Tab		Page No.
1.	Notice of Motion, dated April 14, 2022	62
2.	Affidavit of Michael Carter, sworn April 14, 2022	68
A.	Exhibit "A" – Affidavit of Michael Carter, sworn February 2, 2022	73
B.	Exhibit "B" – Affidavit of Michael Carter, sworn March 1, 2022	106
C.	Exhibit "C" – Affidavit of Michael Carter, sworn March 21, 2022	111
3.	Draft Order (Stay Extension)	118

TAB 1

Court File No. CV-21-00658423-00CL

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985,
c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF JUST ENERGY GROUP INC., JUST ENERGY CORP., ONTARIO ENERGY COMMODITIES INC., UNIVERSAL ENERGY CORPORATION, JUST ENERGY FINANCE CANADA ULC, HUDSON ENERGY CANADA CORP., JUST MANAGEMENT CORP., 11929747 CANADA INC., 12175592 CANADA INC., JE SERVICES HOLDCO I INC., JE SERVICES HOLDCO II INC., 8704104 CANADA INC., JUST ENERGY ADVANCED SOLUTIONS CORP., JUST ENERGY (U.S.) CORP., JUST ENERGY ILLINOIS CORP., JUST ENERGY INDIANA CORP., JUST ENERGY MASSACHUSETTS CORP., JUST ENERGY NEW YORK CORP., JUST ENERGY TEXAS I CORP., JUST ENERGY, LLC, JUST ENERGY PENNSYLVANIA CORP., JUST ENERGY MICHIGAN CORP., JUST ENERGY SOLUTIONS INC., HUDSON ENERGY SERVICES LLC, HUDSON ENERGY CORP., INTERACTIVE ENERGY GROUP LLC, HUDSON PARENT HOLDINGS LLC, DRAG MARKETING LLC, JUST ENERGY ADVANCED SOLUTIONS LLC, FULCRUM RETAIL ENERGY LLC, FULCRUM RETAIL HOLDINGS LLC, TARA ENERGY, LLC, JUST ENERGY MARKETING CORP., JUST ENERGY CONNECTICUT CORP., JUST ENERGY LIMITED, JUST SOLAR HOLDINGS CORP. AND JUST ENERGY (FINANCE) HUNGARY ZRT.

Applicants

NOTICE OF MOTION
(Motion for Stay Extension)

The Applicants will make a motion before the Honourable Justice McEwen of the Ontario Superior Court of Justice (Commercial List) on April 21, 2022 at 10:00 a.m., or as soon after that time as the motion may be heard by judicial videoconference via Zoom at Toronto, Ontario. The videoconference details will be circulated by the Court.

PROPOSED METHOD OF HEARING: The motion is to be heard by videoconference.

THE MOTION IS FOR:

1. An Order substantially in the form included at Tab 3 of the Motion Record extending the Stay Period to May 26, 2022 and approving the activities, conduct and Eighth and Ninth Reports of FTI Consulting Canada Inc., in its capacity as Monitor.
2. Capitalized terms used but not defined in this Notice of Motion shall have the meanings given to them in the Affidavit of Michael Carter sworn April 14, 2022.

THE GROUNDS FOR THE MOTION ARE:

3. The Just Energy Entities have been acting and continue to act in good faith and with due diligence. Both prior to and since the last brief extension to the Stay Period granted by this Court on March 24, 2022, the Just Energy Entities have been engaged in frequent, recurrent meetings and discussions with their key stakeholders (including the DIP Lenders, Credit Facility Lenders, significant Term Loan Lenders, Shell (as a significant Commodity Supplier and secured creditor), and others) in an effort to resolve all outstanding issues with respect to the terms and structure of a restructuring plan to facilitate the Just Energy Entities' emergence from the current CCAA and Chapter 15 proceedings. At all times, the Monitor has been kept apprised of the status of such meetings and discussions, including with respect to progress being made among the Just Energy Entities and their significant stakeholders, and, to the extent appropriate, has meaningfully participated in various discussions in an effort to facilitate resolution of remaining issues. Significant progress has been made and the current number of outstanding issues appears to be limited.
4. In light of the significant progress which has been made toward finalization of a Plan and the limited number of outstanding issues under discussion, the Just Energy Entities do not feel that

it is necessary at this time to seek further direction from the Court regarding their ongoing restructuring efforts and these CCAA proceedings. Instead, the Just Energy Entities are seeking an additional short extension of the Stay Period up to and including May 26, 2022, with the goal of concluding discussions on a Plan and seeking a Meeting Order. The Just Energy Entities will provide a further update to the Court and all stakeholders regarding the status of ongoing discussions and their intention to seek a Meeting Order either during or before the hearing of this motion on April 21, 2022.

5. It is just and convenient and in the interests of the Just Energy Entities and their stakeholders that the Stay Period be extended to May 26, 2022.

6. The Just Energy Entities have sufficient funds to continue their operations and fund these CCAA proceedings during the Stay Period.

Other Grounds

7. In addition to the other grounds discussed in this Notice of Motion, the Applicants rely on:
- (a) the provisions of the CCAA and the inherent and equitable jurisdiction of this Honourable Court;
 - (b) Rules 1.04, 1.05, 2.03, 16, 37, and 59.06 of the *Rules of Civil Procedure*, R.R.O. 1990, Reg. 194, as amended, and section 106 and 137 of the *Courts of Justice Act*, R.S.O. 1990, c. C.43, as amended;
 - (c) changes to Commercial List operations in light of COVID-19 dated March 16, 2020; and

(d) such further and other grounds as the lawyers may advise.

THE FOLLOWING DOCUMENTARY EVIDENCE will be used at the hearing of the Motion:

1. The Tenth Affidavit of Michael Carter, sworn April 14, 2022;
2. The Seventh, Eighth and Ninth Affidavits of Michael Carter, sworn February 2, March 1 and March 21, 2022, respectively;
3. The Ninth Report of the Monitor, to be filed;
4. The Eighth Report of the Monitor, dated April 7, 2022; and
5. Such further and other evidence as the lawyers may advise and this Honourable Court may permit.

April 14, 2022

OSLER, HOSKIN & HARCOURT LLP
100 King Street West
1 First Canadian Place
Suite 6200, P.O. Box 50
Toronto ON M5X 1B8

Marc Wasserman (LSO# 44066M)
Tel: 416.862.4908
Email: mwasserman@osler.com

Michael De Lellis (LSO# 48038U)
Tel: 416.862.5997
Email: mdelellis@osler.com

Jeremy Dacks (LSO# 41851R)
Tel: 416.862.4923
Email: jdacks@osler.com

Counsel to the Applicants

TO: THE SERVICE LIST

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,
R.S.C. 1985, c. C-36, AS AMENDED

Court File No: CV-21-00658423-00CL

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT
OF JUST ENERGY GROUP INC. *et al.*

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

PROCEEDING COMMENCED AT TORONTO

**NOTICE OF MOTION
(Motion for Stay Extension)**

OSLER, HOSKIN & HARCOURT LLP

100 King Street West
1 First Canadian Place
Suite 6200, P.O. Box 50
Toronto ON M5X 1B8

Marc Wasserman (LSO# 44066M)

Tel: 416.862.4908

Email: mwasserman@osler.com

Michael De Lellis (LSO# 48038U)

Tel: 416.862.5997

Email: mdelellis@osler.com

Jeremy Dacks (LSO# 41851R)

Tel: 416.862.4923

Email: jdacks@osler.com

Lawyers to the Applicants

TAB 2

ONTARIO
SUPERIOR COURT OF JUSTICE

COMMERCIAL LIST

IN THE MATTER OF THE *COMPANIES' CREDITORS*
ARRANGEMENT ACT, R.S.C. 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF JUST ENERGY GROUP INC., JUST ENERGY CORP., ONTARIO ENERGY COMMODITIES INC., UNIVERSAL ENERGY CORPORATION, JUST ENERGY FINANCE CANADA ULC, HUDSON ENERGY CANADA CORP., JUST MANAGEMENT CORP., 11929747 CANADA INC., 12175592 CANADA INC., JE SERVICES HOLDCO I INC., JE SERVICES HOLDCO II INC., 8704104 CANADA INC., JUST ENERGY ADVANCED SOLUTIONS CORP., JUST ENERGY (U.S.) CORP., JUST ENERGY ILLINOIS CORP., JUST ENERGY INDIANA CORP., JUST ENERGY MASSACHUSETTS CORP., JUST ENERGY NEW YORK CORP., JUST ENERGY TEXAS I CORP., JUST ENERGY, LLC, JUST ENERGY PENNSYLVANIA CORP., JUST ENERGY MICHIGAN CORP., JUST ENERGY SOLUTIONS INC., HUDSON ENERGY SERVICES LLC, HUDSON ENERGY CORP., INTERACTIVE ENERGY GROUP LLC, HUDSON PARENT HOLDINGS LLC, DRAG MARKETING LLC, JUST ENERGY ADVANCED SOLUTIONS LLC, FULCRUM RETAIL ENERGY LLC, FULCRUM RETAIL HOLDINGS LLC, TARA ENERGY, LLC, JUST ENERGY MARKETING CORP., JUST ENERGY CONNECTICUT CORP., JUST ENERGY LIMITED, JUST SOLAR HOLDINGS CORP. AND JUST ENERGY (FINANCE) HUNGARY ZRT.

Applicants

AFFIDAVIT OF MICHAEL CARTER

I, Michael Carter, of the Town of Flower Mound, in the State of Texas, MAKE OATH AND SAY:

1. I have been Just Energy Group Inc.'s ("**Just Energy**") Chief Financial Officer since September 2020. In that role, I am responsible for all financial-related aspects of the business of Just Energy and its subsidiaries in these CCAA proceedings (collectively, the "**Just Energy Group**" or the "**Applicants**"), including the partnerships listed on Schedule "A" of the Initial Order to which the protections and authorizations of the Initial Order were extended (collectively with the Applicants, the "**Just Energy Entities**"). As such, I have personal knowledge of the

matters deposed to in this affidavit, including the business and financial affairs of the Just Energy Entities. Where I have relied on other sources for information, I have stated the source of my information and I believe such information to be true.

2. I make this affidavit in support of the Applicants' motion returnable on April 21, 2022, for an extension of the Stay Period (as defined below) to, and including, May 26, 2022.

EXTENSION TO THE STAY PERIOD

3. The Initial Order granted a Stay Period until and including March 19, 2021 (the "**Stay Period**"). The Stay Period has subsequently been extended on several occasions, including recently to February 17, 2022, March 4, 2022, March 25, 2022 and April 22, 2022.

4. In support of the Just Energy Entities' recent motions for brief extensions to the Stay Period heard by the Court on February 9, March 3 and March 24, 2022, I swore Affidavits that included comprehensive discussions regarding the Just Energy Entities' ongoing efforts to reach consensus with key stakeholders¹ holding more than \$1 billion CAD in funded debt regarding the terms and structure of a restructuring plan to facilitate the Just Energy Entities' emergence from the current CCAA and Chapter 15 proceedings. Copies of my previous Affidavits, sworn February 2, March 1 and March 21, 2022, excluding exhibits, are attached hereto as **Exhibits "A" to "C"**.

5. Since the Stay Period was last extended on March 24, 2022, the Just Energy Entities have been engaged in frequent, recurrent meetings and discussions with their key stakeholders in an

¹ Such key stakeholders include: (a) the four funds comprising the DIP Lenders in these CCAA proceedings (the "**DIP Lenders**") under the CCAA Interim Debtor-in-Possession Financing Term Sheet dated as of March 9, 2021, as amended; (b) significant lenders under the First Amended and Restated Loan Agreement dated as of September 28, 2020 (the "**Term Loan Lenders**"); (c) the lenders under the ninth amended and restated credit agreement with Just Energy Ontario L.P. and Just Energy U.S., dated as of September 28, 2020 (the "**Credit Facility Lenders**"); (d) Shell Energy North America (Canada) Inc., Shell Energy North America (US), L.P., and Shell Trading Risk Management, LLC as significant Commodity Suppliers to, and secured creditors of, the Just Energy Entities (collectively, "**Shell**"); and (e) CBHT Energy I LLC ("**CBHT**") in its capacity as assignee of all secured pre-filing claims previously held by BP.

effort to resolve all outstanding issues regarding the terms and structure of a restructuring plan to facilitate the Just Energy Entities' emergence from the current CCAA and Chapter 15 proceedings. At all times, the Monitor has been kept apprised of the status of such meetings and discussions, including with respect to progress being made among the Just Energy Entities and their significant stakeholders, and, to the extent appropriate, has meaningfully participated in various discussions in an effort to facilitate resolution of remaining issues. Significant progress has been made with respect to resolving key issues, and the current number of outstanding issues appears to be limited.

6. In my Affidavit sworn March 21, 2022, I noted that the Just Energy Entities intended to seek an Order on or before the current expiry of the Stay Period (April 22, 2022) authorizing them to file a plan of compromise or arrangement (the "**Plan**") for consideration by their creditors, and to call, hold and conduct meetings of creditors to consider and vote on resolutions to approve the Plan (the "**Meeting Order**"). I also advised that if, notwithstanding the Just Energy Entities' best efforts, they were unable to seek a Meeting Order during that time period, the Just Energy Entities intended to seek directions from this Honourable Court regarding their ongoing efforts to restructure and these CCAA proceedings. The Just Energy Entities do not feel that such a request is necessary at this time in light of the advanced stages of discussions regarding the Plan and the limited number of outstanding issues.

7. Instead, the Just Energy Entities are seeking an additional short extension of the Stay Period up to and including May 26, 2022, with the goal of concluding discussions on a Plan and seeking a Meeting Order. The Just Energy Entities will provide a further update to the Court and all stakeholders regarding the status of discussions and their intention to seek a Meeting Order either during or before the hearing of this motion on April 21, 2022.

8. In order to accommodate the longer than anticipated timelines for finalization of the Plan and advancement of the Just Energy Entities' restructuring efforts, the DIP Lenders have agreed to amend the milestone dates under the DIP Term Sheet as follows:

- Delivery of Recapitalization Term Sheet: extended to April 21, 2022;
- Meeting Order: extended to April 28, 2022;
- Mailing of Meeting Materials: extended to May 5, 2022;
- Meeting Order Recognition in Chapter 15 proceedings: extended to May 24, 2022;
- Creditors' Meeting: extended to June 8, 2022;
- Sanction Order: extended to June 15, 2022; and
- Sanction Order Recognition in Chapter 15 proceedings: extended to June 30, 2022.

9. The Just Energy Entities will seek further extensions to the milestone dates, as necessary, to accommodate the status of negotiations leading up to May 26, 2022.

10. The Just Energy Entities have acted and continue to act in good faith and with due diligence in these CCAA proceedings and in working with their significant stakeholders, in consultation with the Monitor, to develop a Plan to present to their creditors. The Just Energy Entities believe that the extension of the Stay Period is necessary and appropriate in the circumstances to provide the Just Energy Entities with an additional short period of time to seek to: (a) conclude their discussions with key stakeholders regarding the limited number of outstanding issues with respect to the terms of a proposed Plan, (b) finalize the Plan, and (c) file a further motion with this Honourable Court for the Meeting Order.

11. I understand that prior to the hearing of this motion the Monitor will file a report (the "**Monitor's Ninth Report**") which will include, among other things, a cash flow forecast

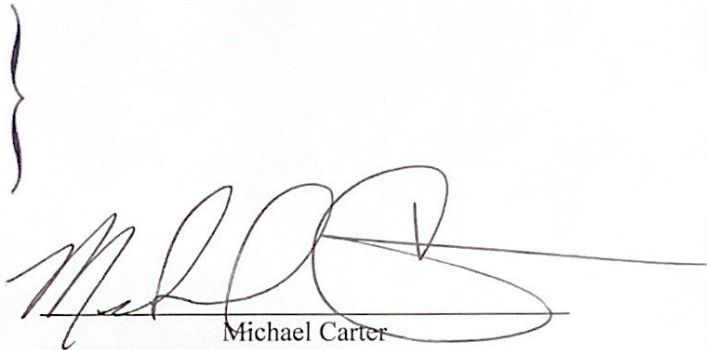
- 5 -

demonstrating that, subject to the underlying assumptions contained therein, the Just Energy Entities will have sufficient funds to continue their operations and fund these CCAA proceedings until May 26, 2022. I further understand that the Monitor's Ninth Report will recommend that the Stay Period be extended.

SWORN BEFORE ME over video teleconference this 14th day of April, 2022 pursuant to O. Reg 431/20, Administering Oath or Declaration Remotely. The affiant was located in the Town of Flower Mound, in the State of Texas while the Commissioner was located in the City Toronto, in the Province of Ontario.



Commissioner for Taking Affidavits
Chloe Nanfara (LSO No. 79715G)



Michael Carter

THIS IS **EXHIBIT "A"** REFERRED TO IN THE AFFIDAVIT OF MICHAEL CARTER SWORN BEFORE ME over video teleconference this 14th day of April, 2022 pursuant to O. Reg 431/20, Administering Oath or Declaration Remotely. The affiant was located in the Town of Flower Mound, in the State of Texas while the Commissioner was located in the City Toronto, in the Province of Ontario.



Commissioner for Taking Affidavits
Chloe Nanfara (LSO No. 79715G)

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

IN THE MATTER OF THE *COMPANIES' CREDITORS
ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF JUST ENERGY GROUP INC., JUST ENERGY CORP., ONTARIO ENERGY COMMODITIES INC., UNIVERSAL ENERGY CORPORATION, JUST ENERGY FINANCE CANADA ULC, HUDSON ENERGY CANADA CORP., JUST MANAGEMENT CORP., 11929747 CANADA INC., 12175592 CANADA INC., JE SERVICES HOLDCO I INC., JE SERVICES HOLDCO II INC., 8704104 CANADA INC., JUST ENERGY ADVANCED SOLUTIONS CORP., JUST ENERGY (U.S.) CORP., JUST ENERGY ILLINOIS CORP., JUST ENERGY INDIANA CORP., JUST ENERGY MASSACHUSETTS CORP., JUST ENERGY NEW YORK CORP., JUST ENERGY TEXAS I CORP., JUST ENERGY, LLC, JUST ENERGY PENNSYLVANIA CORP., JUST ENERGY MICHIGAN CORP., JUST ENERGY SOLUTIONS INC., HUDSON ENERGY SERVICES LLC, HUDSON ENERGY CORP., INTERACTIVE ENERGY GROUP LLC, HUDSON PARENT HOLDINGS LLC, DRAG MARKETING LLC, JUST ENERGY ADVANCED SOLUTIONS LLC, FULCRUM RETAIL ENERGY LLC, FULCRUM RETAIL HOLDINGS LLC, TARA ENERGY, LLC, JUST ENERGY MARKETING CORP., JUST ENERGY CONNECTICUT CORP., JUST ENERGY LIMITED, JUST SOLAR HOLDINGS CORP. AND JUST ENERGY (FINANCE) HUNGARY ZRT.

Applicants

AFFIDAVIT OF MICHAEL CARTER

I, Michael Carter, of the Town of Flower Mound, in the State of Texas, MAKE OATH AND SAY:

1. I have been Just Energy Group Inc.'s ("**JEGI**") Chief Financial Officer since September 2020. In that role, I am responsible for all financial-related aspects of the business of JEGI and its subsidiaries in the CCAA proceedings (collectively, the "**Just Energy Group**" or the "**Applicants**"), including the partnerships listed on Schedule "A" of the Initial Order (as defined below) to which the protections and authorizations of the Initial Order were extended (collectively with the Applicants, the "**Just Energy Entities**"). As such, I have personal knowledge of the

matters deposed to in this affidavit. Where I have relied on other sources for information, I have stated the source of my information and I believe such information to be true. In preparing this affidavit, I have also consulted with the Just Energy Group's senior management team and their financial and legal advisors, and in particular U.S. counsel who has carriage of the Putative Class Actions (as defined below) on behalf of the Just Energy Group.

2. I make this affidavit in support of the Applicants' motion for a short extension of the Stay Period (as defined below) to, and including, March 4, 2022, and in response to the Motion for Advice and Directions brought by Wittels McInturff Palikovic, Finkelstein Blankinship, Frei-Pearson, Garber LLP, and Shub Law Firm LLP (collectively, "**Plaintiffs' Counsel**"), in their capacity as counsel to the proposed representative plaintiffs in *Donin v. Just Energy Group Inc. et al.*¹ (the "**Donin Action**") and *Trevor Jordet v. Just Energy Solutions Inc.*² (the "**Jordet Action**"), together with the Donin Action the "**Putative Class Actions**"), seeking (among other things):

- (a) an order declaring that the plaintiff classes in the Putative Class Actions are to be unaffected by this CCAA Proceeding;
- (b) in the alternative to the relief sought in paragraph 2(a), above, an order implementing a schedule and process (the "**Claims Adjudication Process**") for the final adjudication of the claims arising from the Putative Class Actions (the "**Putative Class Claims**") prior to any consideration by the Court of the

¹ No. 17 Civ.5787 (WFK) (SJB)(E.D.N.Y.).

² No. 18 Civ. 953 (WMS) (W.D.N.Y.).

Applicants' proposed plan of compromise or arrangement (the "**Plan**") or other event to exit this CCAA Proceeding;

- (c) an order directing the Applicants to provide the plaintiffs with access to any data room established by the Applicants in respect of these proceedings, and appointing a mediator/arbitrator (the "**Mediator/Arbitrator**") to resolve all matters pertaining to the production of documents and access to information for restructuring purposes (as distinct from production for the purpose of the Claims Adjudication Process);
- (d) in the alternative to the relief sought in paragraph 2(c), above, an order:
 - (i) directing the specific production of the following documents and information within seven (7) days of the date of the order:
 - (A) a listing of creditors, the amount claimed by each creditor, whether security or other priority is claimed, and the status of the claim (i.e., allowed/contested/subject to ongoing review/etc.) and the aggregate number of creditors and claims;
 - (B) the DIP Term Sheet, each of its revisions, the latest current form, a conformed copy of the DIP term sheet with all revisions, any future updates, signature pages, DIP loan amount exhibits by DIP Loan participant, and definitive documents, and any other related non-privileged documents;
 - (C) copies of all of the Applicants' insurance policies that might respond to the Putative Class Claims, the coverage status, the total amount drawn against the policy to date, and a list of competing claims made against the policies;
 - (D) a list and the expected timing of key events in the CCAA Proceeding, including the release of the Applicants' proposed exit plan and how such exit plan is to be put before the Court and Creditors for approval;
 - (E) the restructuring, realization and/or sale or investment process related to any and all exit plans under consideration by the Applicants;

- (F) any debt capacity analyses by the company and/or its investment bank;
 - (G) an updated business plan showing updates of actual results to projected results, an update showing the range of recoveries as per Texas House Bill 4492, the proceeds from the sale of ecobee Shares, and all other updates included in the business plan since it was published in May 2021; and
 - (H) a statement of the enterprise value of the company with supporting documents showing methodology, multiples, discount rates used, and comparables relied upon;
- (ii) directing the Applicants and their necessary advisors to meet with Plaintiffs' Counsel and their advisors within seven (7) days of the completion of production of the foregoing information, to review the information and answer questions; and
 - (iii) scheduling a further case conference within 21 days of the date of the order to report on the status of its implementation and to schedule such further case conferences or hearings as may be necessary for the effective management and supervision of these proceedings;

3. The Applicants are seeking to have the plaintiff's motion dismissed in its entirety. Among other things:

- (a) The Applicants have already provided Plaintiffs' Counsel with confidential information pursuant to an NDA (defined below) in addition to the information available in JEGI's public company filings and the extensive documentation filed in the CCAA Proceedings. The Applicants and the Monitor have also answered questions posed by Plaintiffs' Counsel and attended numerous calls with them. The Applicants have diligently responded to reasonable information requests.
- (b) The Applicants are addressing the plaintiffs' claims pursuant to the Claims Procedure Order and are prepared to engage with Plaintiffs' Counsel and the Monitor to appoint a Claims Officer to efficiently determine the claims. To that

end, the Applicants have proposed a fair and reasonable schedule for the adjudication of the claims, subject to the discretion of the Claims Officer; and

- (c) The Applicants are currently negotiating a restructuring solution with their funded debt holders to preserve the Just Energy Entities' business as a going concern. Once that process is complete, the Applicants will seek court approval of any restructuring solution. All stakeholders will have an opportunity to make submissions to the Court with respect to the proposed restructuring at the appropriate time.

4. The Applicants and their advisors are spending an inordinate amount of time dealing with two contingent, uncertified, unsecured creditors whose claims have been disallowed in full. The Applicants require breathing space to focus on their restructuring discussions with the stakeholders that have funded the Just Energy Entities and should not be required to expend additional resources responding to extensive information requests at this time.

5. All references to monetary amounts in this affidavit are in Canadian dollars unless noted otherwise.

A. HISTORY OF THE CCAA PROCEEDINGS

6. On March 9, 2021 (the "**Filing Date**"), the Applicants obtained protection under the *Companies' Creditors Arrangement Act*, RSC 1985, c C-36 (the "**CCAA**") pursuant to an initial order (the "**Initial Order**") of the Ontario Superior Court of Justice (Commercial List) (the "**CCAA Court**"). The Applicants' filing for protection under the CCAA was precipitated by the

acute and unforeseen liquidity challenge caused by the unprecedented winter storm in Texas and the Texas regulators' response to same.

7. The Initial Order has twice been amended and restated. The CCAA Court granted an Amended and Restated Initial Order (the “**ARIO**”) and a Second Amended and Restated Initial Order (the “**Second ARIO**”) on March 19, 2021, and May 26, 2021, respectively.

8. On April 2, 2021, the United States Bankruptcy Court for the Southern District of Texas granted a Final Recognition Order (the “**Final Recognition Order**”) which, among other things, granted the ARIO, including any and all existing and future extensions, amendments, restatements, and/or supplements authorized by the CCAA Court, with full force and effect on a final basis with respect to the Just Energy Entities' property located within the United States.³

9. On September 15, 2021, the CCAA Court granted the Claims Procedure Order establishing a process (the “**Claims Process**”) to determine the nature, quantum, and validity of Claims against the Just Energy Entities and their respective Directors and Officers. The Claims Procedure Order established a Claims Bar Date of November 1, 2021. A copy of the Claims Procedure Order is attached hereto as **Exhibit “A”**. Since the Claims Bar Date, the Just Energy Entities have been working diligently with the Monitor to review, record, dispute and, where appropriate, finally determine the amount and characterization of Claims against the Just Energy Entities and their respective Directors and Officers.

10. On November 10, 2021, the CCAA Court granted an Order which, among other things, approved an amendment to the CCAA Interim Debtor-in-Possession Financing Term Sheet, dated

³ The Final Recognition Order also provided that, “All parties who believe they have a claim against any of the Debtors are obligated to file such claims in, and only in, the Canadian Proceeding.”

as of March 9, 2021 (the “**DIP Term Sheet**”) to, among other things, extend the maturity date thereunder from December 31, 2021 to September 30, 2022, and extend the Stay Period (as defined in the Second ARIO) to February 17, 2022.

B. EXTENSION TO THE STAY PERIOD

11. Since the Stay Period was last extended on November 10, 2021, the Just Energy Entities, with the assistance of their legal and financial advisors, and in close consultation with the Monitor, have been working in earnest to advance their restructuring. Throughout the past number of months, the Just Energy Entities have continued their extensive engagement with their most significant stakeholders who are financially participating in the restructuring, including the lenders under the DIP Term Sheet (the “**DIP Lenders**”) (who are also lenders under the non-revolving term loan established pursuant to the Term Loan Agreement as part of the 2020 balance sheet recapitalization transaction, the assignees of a significant secured supplier claim from BP, and the Plan sponsor under the company’s Plan), the lenders under the ninth amended and restated credit agreement with Just Energy Ontario L.P. and Just Energy (U.S.) Corp., dated as of September 28, 2020 (the “**Credit Facility Lenders**”), and Shell⁴ (a significant secured supplier), regarding a framework for the recapitalization of the Just Energy Entities and their respective businesses.

12. The Plan is intended to preserve the going concern value of the Just Energy Entities’ businesses for the benefit of stakeholders (including the company’s approximately 950,000 customers and significant trading partners), maintain the employment of the Just Energy Entities’

⁴ Collectively, Shell Energy North America (Canada) Inc., Shell Energy North America (US), L.P., and Shell Trading Risk Management, LLC.

more than 1000 employees, and support the long-term viability of the business upon emergence from these CCAA and Chapter 15 proceedings.

13. The discussions regarding the Plan include renegotiation of the complex intercreditor arrangement which governs the secured debt portion of the Just Energy Entities' capital structure, defining the relative priorities of the various parties' security interests and specifying the priority of such interests in accordance with the waterfall defined therein.⁵ The company has enjoyed the financial support of its most significant stakeholders to date, including multiple extensions of milestones by the DIP Lender to facilitate the Applicants' going-concern restructuring.

14. Given the nature of the business, the length of time the Applicants have been in the CCAA proceedings, the complexities and time consuming nature of the multiparty negotiations, and the volatility of the energy market, any significant delays in the conclusion of the restructuring could have damaging effects on the outcome for stakeholders and the support of the financial participants for the proposed restructuring. It is therefore imperative that the parties are able to conclude negotiations for the Plan and emerge from these CCAA proceedings as soon as possible. The parties' discussions are in advanced stages and are expected to conclude in the coming weeks.

15. In addition to operating a complicated business and negotiating a series of complex restructuring documents, management of the Just Energy Entities has been preparing since late last week for harsh winter weather that is forecast to significantly impact Texas later this week, which has required many hours of meetings and calls to review the Applicants' commodity supply

⁵ A copy of the intercreditor agreement can be found at Exhibit "P" to my affidavit sworn March 9, 2021 which can be accessed at the following link: <http://cfcanada.fticonsulting.com/justenergy/docs/Re%20Just%20Energy%20Inc%20et%20al%20-%20Application%20Record.pdf>

positions, hedging strategies and liquidity positions. While the Applicants believe they are prepared to manage through this event, it is prudent that management's time and resources continue be focused on the business' operations. Similar adverse weather events are always a risk and may continue to require significant management attention.

16. The Just Energy Entities are seeking a short, two-week extension to the Stay Period from February 17, 2022 to and including March 4, 2022 to permit them to (i) conclude their discussions with key stakeholders that have financially supported this company during these CCAA proceedings regarding the terms of a proposed Plan, (ii) finalize the Plan, and (iii) file a further motion with this Honourable Court for, among other things, an Order accepting the Plan for filing and authorizing the Just Energy Entities to call, hold and conduct virtual meetings of creditors to consider and vote on resolutions to approve the Plan. The Just Energy Entities currently have March 3, 2022 scheduled for the hearing of such motion.

17. The Just Energy Entities have acted and continue to act in good faith and with due diligence in these CCAA proceedings. Since the Stay Period was last extended on November 10, 2021, the Just Energy Entities have, among other things:

- (a) continued their extensive and ongoing engagement with the DIP Lenders, the Credit Facility Lenders and Shell regarding the terms of the Plan;
- (b) continued reviewing and, in consultation with the Monitor, determining claims received within the Claims Process in accordance with the Claims Procedure Order including, but not limited to, (i) preparing and issuing Notices of Revision or Disallowance and notices of claim acceptance, where appropriate, (ii) engaging with certain claimants to discuss resolution and settlement of ongoing disputes

regarding their claims; and (iii) attending discussions with, and responding to inquiries from, multiple stakeholders and/or the Monitor regarding the Claims Process and Proofs of Claim/D&O Proofs of Claim received within the Claims Process;

- (c) commenced litigation against the Electric Reliability Council of Texas (“**ERCOT**”) and the Public Utility Commission of Texas (the “**PUCT**”) in the US Court on November 12, 2021, seeking to recover payments that were made by various of the Just Energy Entities to ERCOT for certain invoices in February 2021 relating to the unprecedented winter storm in Texas in February 2021. A copy of Just Energy’s Press Release announcing commencement of the litigation is attached hereto as **Exhibit “B”**;
- (d) received and undertook a review of ERCOT’s calculations of recoveries of certain costs to be securitized under House Bill 4492 which ERCOT filed with the PUCT on December 9, 2021 and according to which the Just Energy Entities expect to recover funds of approximately US\$147.5 million. A copy of Just Energy’s Press Release announcing release of ERCOT’s calculations is attached hereto as **Exhibit “C”**;
- (e) completed the windup and dissolution of Just Energy Finance Holding Inc. (“**JE Finance**”), and amended the style of cause in these CCAA proceedings to remove JE Finance as an Applicant, all in accordance with the Order of the CCAA Court, granted November 10, 2021. A copy of the Certificate of Dissolution is attached hereto as **Exhibit “D”**.

- (f) continued to maintain regular communications with various regulators across Canada and the United States and satisfy all obligations to regulators that license one or more of the Just Energy Entities in the ordinary course. All licenses and registrations that the Just Energy Entities held as of the Filing Date remain valid and in full force and effect;
- (g) continued to provide all required reporting to the DIP Lenders, Credit Facility Lenders and the Qualified Commodity/ISO Suppliers in accordance with the ARIO, the DIP Term Sheet, and all Qualified Support Agreements, as applicable, and negotiated changes to certain milestone dates under the DIP Term Sheet, as necessary, to facilitate restructuring discussions; and
- (h) operated the business in the normal course with a view to maximizing the value of the Just Energy Entities for the benefit of all stakeholders.

18. I understand that the Monitor will file a report (the “**Monitor’s Fifth Report**”) that will include, among other things, a cash flow forecast demonstrating that, subject to the underlying assumptions contained therein, the Just Energy Entities will have sufficient funds to continue their operations and fund these CCAA proceedings until March 4, 2022. I further understand that the Monitor’s Fifth Report will recommend that the Stay Period be extended.

C. BACKGROUND TO THE PUTATIVE CLASS ACTIONS

19. The information in this section is based on my review of court documents, the involvement of the senior management team in the litigation, and information received from Jason Cyrulnik of Cyrulnik Fattaruso LLP, US counsel for the defendants in the Putative Class Actions.

(a) **Jordet Action**

20. On April 6, 2018, Trevor Jordet filed the Jordet Action solely against Just Energy Solutions, Inc. (“**Just Energy Solutions**”) on behalf of a putative class of all “Just Energy customers charged a variable rate for residential natural gas services by Just Energy from April 2012 to the present”. The plaintiff alleged, among other things, that the defendant violated Pennsylvania Unfair Trade Practices and Consumer Protection Law (“**PUTPCP**”), breached contractual provisions and an implied covenant of good faith requiring Just Energy Solutions to consider “business and market conditions” when it charged rates that were more than the local utility rate for natural gas, and was unjustly enriched as a result of the alleged misconduct.

21. Importantly, the Jordet Action does not purport to deal with any electricity customers of Just Energy Solutions. A copy of the plaintiff’s complaint in the Jordet Action is attached as Exhibit “D” to the affidavit of Robert Tannor sworn January 17, 2022 (the “**Tannor Affidavit**”) filed in support of the plaintiffs’ Motion for Advice and Directions.

22. The Tannor Affidavit at paragraphs 7 and 38 mischaracterizes the result of the motion to dismiss that was brought by the defendant. In fact, the defendant achieved significant success on this motion that restricted the causes of action that may be alleged in the proposed class action. The US District Court in the Western District of New York (the “**WDNY Court**”) dismissed the PUTPCP and unjust enrichment claims, such that only the alleged breach of contract claim remains.⁶ Moreover, the WDNY Court held that claims for breach of contract prior to April 6,

⁶ As the WDNY Court noted in its decision on the motion to dismiss, a breach of the implied covenant of good faith is not a distinct cause of action from breach of contract under Pennsylvania law. *Jordet v. Just Energy Solutions Inc.*, Decision and Order 18-CV-953S regarding Motion to Dismiss dated December 7, 2020 (“**Jordet Motion to Dismiss Decision**”), Dkt. 43, at 4.

2014, are time-barred. A copy of the WDNY Court’s decision on the motion to dismiss dated December 7, 2020 is attached as Exhibit “E” to the Tannor Affidavit.

23. The WDNY Court’s decision was based solely on the pleadings being taken as true. Indeed, the WDNY Court noted in its decision that it “cannot dismiss a Complaint unless it appears ‘beyond doubt that the plaintiff can prove no set of facts in support of his claim which would entitle him to relief.’”⁷ The lone remaining claim therefore turns on whether Just Energy Solutions breached contractual commitments to use its discretion to set rates consistent with “business and market conditions” (defined to include a host of factors), and the WDNY Court found that whether Just Energy Solutions’ pricing adhered to that discretionary standard could not readily be resolved solely on the pleadings.⁸ In other words, there was no determination by the Court on the merits of the remaining breach of contract claims asserted by the plaintiff.

24. As a result, the WDNY Court’s decision materially narrows the scope of the Jordet Action.

(b) Donin Action

25. On October 3, 2017, Fira Donin and Inna Golovan filed the Donin Action against JEGI, Just Energy New York Corp. (“**Just Energy NY**”), and John Does 1-100, which the plaintiffs alleged were “shell companies and affiliates” through which JEGI did business in New York and elsewhere, as well as “Just Energy management and employees who perpetrated the unlawful acts.” The action was brought on behalf of a putative class of “all Just Energy customers in the

⁷ Jordet Motion to Dismiss Decision, at 6.

⁸ Jordet Motion to Dismiss Decision, at 17-18.

United States [...] who were charged a variable rate for their energy at any time from [applicable statute of limitations period] to the date of judgment”.

26. The plaintiffs alleged, among other things, that the defendants engaged in fraudulent conduct, violated New York statutes by engaging in deceptive acts and practices, breached contractual provisions to consider “business and market conditions”, and breached the implied covenant of good faith when it charged rates that were more than the local utility rate for natural gas and electricity in New York. A copy of the plaintiffs’ complaint in the Donin Action is attached as Exhibit “B” to the Tannor Affidavit.

27. Again, the defendants were largely successful on the motion to dismiss, which significantly narrowed the scope of claims in the Donin Action. The US District Court in the Eastern District of New York (the “**EDNY Court**”) dismissed all the plaintiffs’ claims except for the breach of contract and implied covenant of good faith claims. A copy of the EDNY Court’s decision on the motion to dismiss dated September 24, 2021 is attached as Exhibit “C” to the Tannor Affidavit.

28. As noted by the EDNY Court, the plaintiff in a motion to dismiss must only “state a claim of relief that is plausible on its face”, accepting for the purposes of the motion that the factual allegations contained in the complaint are true.⁹ The EDNY Court did not make a judicial determination that Just Energy NY had improperly exercised its contractually agreed discretion to set rates, or even that Just Energy NY did not consider the many different business and market conditions in setting its rates. These were all matters which could not be resolved solely on the pleadings.

⁹ *Donin et al v. Just Energy Group Inc. et al*, Decision and Order 17-CV-5787(WFK)(SJB) regarding Motion to Dismiss dated September 24, 2021, Dkt. 111, at 4.

29. The EDNY Court also found that it did not have jurisdiction over John Does 1-100. All claims against these defendants were dismissed. This decision effectively limits the Donin class, should it be certified, to New York customers, as JEGI is a holding company that does not contract with any customers and Just Energy NY only contracts with customers based in New York.

30. On January 10, 2020, over Plaintiffs' Counsel's objection, the EDNY Court ordered that factual discovery in this matter was closed and that all pending discovery requests and disputes before that Court were terminated. This ruling came after years of discovery, including the production of documents by the defendants in response to numerous requests by the plaintiffs. All discovery to date has been limited to the defendants' New York business, consistent with the limited scope of the remaining claim.

(c) Proofs of Claim

31. On November 1, 2021, Plaintiffs' Counsel filed two Proofs of Claim in respect of the Donin and Jordet Actions, each in the unsecured amount of approximately USD\$3.66 billion.¹⁰ Copies of the Donin Proof of Claim, the Jordet Proof of Claim and the Claim Documentation included in both Proofs of Claim (excluding Exhibits 2-5, which are copies of the pleadings and motions to dismiss for both Putative Class Actions) are attached to the Tannor Affidavit as Exhibits "F", "G" and "H", respectively.

¹⁰ The damages calculation purports to be a joint, composite damages claim encompassing both lawsuits, notwithstanding the fundamental differences in terms of the defendants, scope of the claim and potential class members in the two actions.

(d) Notices of Disallowance

32. On January 11, 2022, the Monitor sent the proposed representative plaintiffs in the Putative Class Actions Notices of Disallowance in accordance with the Claims Procedure Order (the “**Notices of Disallowance**”). Copies of the Donin Notice of Disallowance and the Jordet Notice of Disallowance are appended to the Tannor Affidavit as Exhibits “Q” and “R”, respectively.

33. The Notices of Disallowance disallowed the claims advanced in both Proofs of Claim in full as, among other things, contingent, uncertified, speculative, and remote.

34. The Notices of Disallowance specifically address the plaintiffs’ attempts to expand the scope of their claims to add new defendants, new customer groups, and extended class periods. The Proofs of Claim purport to advance claims against all “Just Energy Entities” on behalf of both gas and electricity customers, notwithstanding the fact that:

- (a) the Jordet Action only names Just Energy Solutions as defendant and is only brought on behalf of natural gas customers;
- (b) the only named defendants in the Donin Action are JEGI and Just Energy NY and the EDNY Court dismissed all claims against JEGI’s other affiliates; and
- (c) the WDNY Court found claims prior to April 6, 2014 were time-barred in the Jordet Action.

35. The attempted expansion of the plaintiffs’ claims is illustrated in the below chart:

	Donin Complaint/ Motion to Dismiss	Donin POC	Jordet Complaint/ Motion to Dismiss	Jordet POC
Defendants	JEGI, Just Energy NY EDNY Court dismissed claims against other JEGI affiliates.	All “Just Energy Entities”	Just Energy Solutions	All “Just Energy Entities”
Defendants’ Customer Base¹¹	New York	California Delaware Georgia Illinois Indiana Maryland Massachusetts, Michigan Nevada New Jersey New York Ohio Pennsylvania Texas	California Georgia Illinois Maryland Nevada Ohio Pennsylvania Virginia	California Delaware Georgia Illinois Indiana Maryland Massachusetts, Michigan Nevada New Jersey New York Ohio Pennsylvania Texas
Defendants’ Customer Type	Largely Residential	Residential and Commercial	Largely Residential	Residential and Commercial
Product Type	Electricity and Natural Gas	Electricity and Natural Gas	Natural Gas Only	Electricity and Natural Gas
Class Period	Pleadings refer to “applicable Statute of Limitations Period” ¹²	2011-2020	WDNY Court held claims prior to April 6, 2014 are time-barred.	2011-2020

¹¹ The customer base in the “Jordet Complaint/ Motion to Dismiss” column reflects the states where natural gas was marketed by Just Energy Solutions. Just Energy Solutions marketed natural gas in these various states for different lengths of time.

¹² I am informed by Mr. Cyrulnik and believe that a six-year statute of limitations period applies to New York contract claims, which would render claims accruing prior to October 3, 2011, time-barred.

36. It is notable that the plaintiffs have not attempted to add any additional defendants (or in the case of Jordet Action, to add electricity customers) to the Putative Class Actions in the approximately four years since they were commenced.

37. Additionally, the Notices of Disallowance state that:

- (a) **Contractual Language:** The applicable contracts put customers (including the plaintiffs) on clear notice of the variable rates that the defendants would set and explicitly state that “This Agreement does not guarantee financial savings”;
- (b) **Comparison to Local Utilities is Flawed:** The plaintiffs’ allegation that the defendants breached the parties’ contracts by failing to set rates “according to business and market conditions” is premised on the erroneous assumption that local public utilities (not other energy service companies (“**ESCOs**”)) are the defendants’ main competitors, and as such the defendants overcharged when their rates were higher than that of the local utility. Local utility rates are not an appropriate barometer by which to measure the rates of ESCOs as: (i) local utilities and ESCOs offer different products and services and have different business models; and (ii) local utility commodity prices do not reflect wholesale energy prices and do not include reasonable profit margins; and
- (c) **Damages Calculations are Inflated:** The calculation of the quantum of damages in the plaintiffs’ purported expert report is speculative, highly inflated and based on a number of flawed assumptions. For instance, the report assumes that 50% of residential and commercial natural gas and electricity usage of the Just Energy Group’s customer base is attributable to customers that are parties to variable rate

contracts that would be included in the proposed class. However, currently only 2.1% and 0.04%, respectively, of natural gas and electricity usage is attributable to customers who are parties to variable rate contracts with the Just Energy Entities.

38. The Tannor Affidavit (para. 50) improperly suggests that the Notices of Disallowance “rejected the alleged class size and quantum without any evidence and without even addressing the comprehensive expert report.” To the contrary, the substantive flaws in the expert report are outlined in detail on pages 6-10 of both Notices of Disallowance.

39. The Notices of Disallowance also outlined a number of reasons as to why the Putative Class Actions are not amenable to certification pursuant to the relevant US law.

D. Communication with, and Information Provided to, Plaintiffs’ Counsel

40. The Tannor Affidavit suggests that the Applicants and the Monitor have not been responsive to information requests over the last twelve weeks. This is simply not the case.

41. The Just Energy Group and the Monitor have engaged with Plaintiffs’ Counsel since they first contacted the Monitor’s legal counsel by email on November 11, 2021. This process included signing a Confidentiality, Non-Disclosure and Non-Use Agreement (the “**NDA**”), providing Plaintiffs’ Counsel with confidential information and documents, answering numerous written questions, and arranging multiple meetings with Plaintiffs’ Counsel and its financial advisor, Tannor Capital Advisors (“**Tannor Capital**”) that have included, at various times, counsel for the Just Energy Group (“**Osler**”), the Monitor, counsel to the Monitor, and the financial advisor to the Just Energy Group.

42. The Tannor Affidavit (para. 14) notes that “Mr. Wittels also alleged [on November 10, 2021] that the Applicants had not been forthcoming in providing Class Counsel with any information as to the Applicants’ financial status.” However, this statement is misleading, as Plaintiffs’ Counsel made no requests for any information until November 11, 2021 – eight months after the Applicants filed for CCAA protection on March 9, 2021. In fact, the first time that Osler had any interaction with Mr. Wittels was when Mr. Wittels appeared at the November 10, 2021 court hearing to oppose certain relief being sought, without previously advising the Monitor or Osler that he intended to do so.

43. The following is a chronology outlining the communications with, and information provided to, Plaintiffs’ Counsel and the plaintiffs’ Canadian counsel, Paliare Roland Rosenberg Rothstein LLP (“**Paliare Roland**”), over the last twelve weeks, based on my discussions with Osler:

Date	Event
November 10, 2021	Plaintiffs’ Counsel appeared on a motion before Justice Koehnen and objected to the second Key Employee Retention Plan. Plaintiffs’ Counsel did not reach out to the Just Energy Group or the Monitor in advance of this Court appearance to advise of his intended opposition.
November 11, 2021	Plaintiffs’ Counsel emailed counsel for the Monitor for the first time to request a meeting to discuss being granted access to “certain financial information”. On Friday, November 12, 2021, Counsel for the Monitor responded by email to Plaintiffs’ Counsel indicating that their information request was best directed to the Just Energy Entities and copied Osler. The following Monday, November 15, 2021, Osler responded by email to Plaintiffs’ Counsel and indicated they would be contacting them to discuss the requests.
November 19, 2021	Osler, Monitor’s counsel, Plaintiffs’ Counsel, Paliare Roland, and Tannor Capital attended a call to discuss Plaintiffs’ Counsel’s request for information.

November 22, 2021	Osler provided the draft NDA to Plaintiffs' Counsel.
November 24, 2021	Plaintiffs' Counsel and Paliare Roland attended a call with Osler, the Monitor and counsel to the Monitor to discuss comments received from Plaintiffs' Counsel and Paliare Roland on the draft NDA.
November 30, 2021	After various revisions from the parties, JEGI, Plaintiffs' Counsel, Tannor Capital and Paliare Roland entered into the NDA. The NDA explicitly states that it does not create any obligation to share documents with Plaintiffs' Counsel.
December 2, 2021	Plaintiffs' Counsel provided a list of questions to Osler (the " December 2nd Questions ").
December 8, 2021	<p>Osler provided comments on the December 2nd Questions as well as copies of the Business Plan, DIP Term Sheet, and two Amendments to the DIP Term Sheet. The DIP Term Sheet and two Amendments were previously disclosed in Court filings. A copy of the answers to the December Second Questions and the Business Plan are attached as confidential Exhibits "E" and Exhibit "F", respectively, to this affidavit, as they contain confidential information and were provided pursuant to the terms of the NDA.</p> <p>Osler attended a call with Plaintiffs' Counsel, Tannor Capital, the Monitor, counsel to the Monitor, and the Just Energy Group's financial advisor to discuss the December 2nd Questions as well as the restructuring more generally.</p>
December 13, 2021	Plaintiffs' Counsel emailed an additional list of questions (the " December 13th Questions ") along with a proposed adjudication schedule to Osler.
December 15, 2021	<p>Osler responded to Plaintiffs' Counsel, noting that:</p> <ul style="list-style-type: none"> • The Just Energy Group and its advisors were working hard to develop a going concern restructuring solution for the Just Energy Entities and were not in a position to devote additional resources at that time to answer an unreasonable number of questions and inquiries from Plaintiffs' Counsel; • Sufficient information was already available to Plaintiffs' Counsel between JEGI's public company filings, the extensive documentation filed in the CCAA Proceedings, the information that had already been provided pursuant to the terms of the NDA, and the multiple discussions Plaintiffs' Counsel and their advisors had with representatives from Osler, the Monitor and its counsel and the Just Energy Group's financial advisor; and

	<ul style="list-style-type: none"> The Just Energy Group would deal with the plaintiffs' claims in the framework of the Claims Procedure Order, the plaintiffs would have 30 days from the receipt of any Notice of Revision or Disallowance to file a Notice of Dispute, and the Just Energy Group anticipated further discussions with Plaintiffs' Counsel concerning a fair and reasonable method of adjudicating the Putative Class Claims at the appropriate time.
December 17, 2021	Plaintiffs' Counsel emailed the Monitor requesting a call regarding its information requests and its proposed adjudication timetable. Copies of the correspondence from December 13-17 is attached to the Tannor Affidavit as Exhibit "O".
December 22, 2021	I understand that the Monitor attended a call with Plaintiffs' Counsel to discuss their requests and to confirm that responses to the December 13th Questions would be forthcoming.
December 23, 2021	The Monitor responded to the December 13 th Questions with the assistance of the Just Energy Entities. Among other things, the Monitor noted that in numerous instances, Plaintiffs' Counsel was asking discovery questions that were not relevant to developing an understanding of the restructuring process. A copy of the December 23 rd response is attached as confidential Exhibit "G" to this affidavit, as this contains confidential information and was provided pursuant to the terms of the NDA.
December 28, 2021	Paliare Roland emailed the Monitor requesting assistance in setting a case conference with the presiding Judge for the first week of January in order to schedule a date for a motion.
December 30, 2021	The Monitor responded with a proposal to email the Court for a case conference in the first two weeks of January. The following day, Osler indicated that it requested that any case conference be heard in the second week of January.
January 4, 2022	<p>Paliare Roland responded that it did not consent to seeking the case conference in the second week of January.</p> <p>I understand that counsel for the Monitor and the Monitor attended a call with Plaintiffs' Counsel to hear directly from them about the nature and background to their purported claims and also provide an anticipated delivery date for the Notices of Revision or Disallowance to be issued.</p> <p>The Monitor responded that same day, confirming that no plan would be presented by January 6, noting that all deadline dates under the DIP Term Sheet were extended by one week and suggesting a call to discuss the timetable for the plaintiffs' motion. A complete copy of the correspondence from December 28-January 4 is attached to this affidavit as Exhibit "H".</p>

January 5, 2022	Osler, the Monitor and its counsel, Plaintiffs' Counsel, Paliare Roland, and Tannor Capital attended another call and discussed, among other things, the timetable for the plaintiffs' motion and the anticipated delivery of Notices of Revision or Disallowance with respect to the Putative Class Actions in accordance with the Claims Procedure Order.
-----------------	---

44. With respect to the above chronology, I note that the Tannor Affidavit omitted to reference the following calls and correspondence, which results in an incomplete record:

- (a) The November 19, 2021 call amongst Osler, Monitor's counsel, Plaintiffs' Counsel, and Tannor Capital;
- (b) The fact that the Applicants' financial advisor attended the December 8th call with Plaintiffs' Counsel, Tannor Capital, Osler, the Monitor, and counsel to the Monitor;
- (c) The Monitor's response, with the assistance of the Applicants, to the December 13th Questions on December 23, 2021;
- (d) The Monitor's response to Paliare Roland's email on January 4, 2022; and
- (e) The January 5, 2022 call amongst Osler, the Monitor and its counsel, Plaintiffs' Counsel, Paliare Roland, and Tannor Capital.

45. The Tannor Affidavit (para. 45) notes that JEGI's September 30, 2021 financial statements indicate that it had approximately \$12.6 million in equity on its balance sheet. The plaintiffs extrapolate from this fact that they have a "significant stake in the CCAA Proceedings" and are therefore entitled to extensive information from the Applicants. This assumption is based on a

fundamental misunderstanding of the September 30, 2021 financial statements, a complete copy of which is attached to this affidavit as **Exhibit “I”**.

46. JEGI’s balance sheet is prepared in accordance with international financial reporting standards (“**IFRS**”) and does not necessarily represent the fair value of all the assets and liabilities of the Applicants. In particular, JEGI’s balance sheet includes approximately \$545 million of net derivative financial assets resulting from approximately \$580 million of unrealized gains on its derivative instruments in the six months ended September 30, 2021. These derivative instruments are mostly fixed supply contracts which JEGI uses to hedge the future price of electricity and natural gas associated with its fixed price contracts with its customers.¹³ These asset values are highly volatile, as they fluctuate depending on current market price for the commodity supply. This approximately \$545 million net derivative financial asset was an approximately \$40 million net financial derivative liability as at March 31, 2021. IFRS considers the commodity supply contracts to be financial derivatives and therefore these contracts are required to be marked-to-market resulting in unrealized gains (or losses) being recorded in Just Energy’s financial statements even though these supply contracts are entered into to lock in the future gross margin of JEGI under its fixed price customer contracts. It is for these reasons that JEGI has historically and consistently excluded these unrealized gains/losses from its calculation of EBITDA, as noted at page 6 of Management’s Discussion and Analysis for the three and six months ended September 30, 2021:

Just Energy ensures that customer margins are protected by entering into fixed-price supply contracts. Under IFRS, the customer contracts are not marked to market; however, there is a requirement to mark to market the future supply

¹³ Just Energy enters into derivative instruments in order to manage exposures to changes in commodity prices associated with its fixed price customer contracts. The derivative instruments that are used are designed to fix the price of supply for estimated customer commodity demand and thereby fix gross margins.

contracts. This creates unrealized and realized gains (losses) depending upon current supply pricing. Management believes that the unrealized mark to market gains (losses) do not impact the long-term financial performance of Just Energy and has excluded them from the Base EBITDA calculation.

47. Given the fact that these unrealized gains/losses are not included in the Base EBITDA calculation, the net financial derivative assets/liabilities must also be excluded when considering the true value of the equity of the company. Absent these net financial derivative assets, JEGI's balance sheet equity would have been approximately negative \$540 million as of September 30, 2021. Given the drop in commodity prices during the 3 months ended December 31, 2021, I anticipate that there will be substantial unrealized losses from JEGI's derivative instruments as at December 31, 2021 resulting in significantly lower net financial derivative assets, which will result in a substantial negative balance sheet equity value when JEGI files its financial statements as at December 31, 2021.

48. Additionally, the September 30, 2021 financial statements referred to in the Tannor Affidavit contain a Going Concern note:

Going Concern

Due to the Weather Event and associated CCAA filing, the Company's ability to continue as a going concern for the next 12 months is dependent on the Company emerging from CCAA protection, maintain liquidity, complying with DIP Facility covenants and extending the DIP Facility maturity. The material uncertainties arising from the CCAA filings cast substantial doubt upon the Company's ability to continue as a going concern and, accordingly the ultimate appropriateness of the use of accounting principles applicable to a going concern. These Interim Condensed Consolidated Financial Statements do not reflect the adjustments to carrying values of assets and liabilities and the reported expenses and Interim Condensed Consolidated Statements of Financial Position classifications that would be necessary if the going concern assumption was deemed inappropriate. These adjustments could be material. There can be no assurance that the Company will be successful in emerging from CCAA as a going concern.

49. Similar going concern notes were included in JEGI's audited financial statements for the year ended March 31, 2021 as well as the June 30, 2021 quarterly report. Full copies of these

financial statements are attached to this affidavit as **Exhibits “J” and “K”**, respectively. Additionally, various of JEGI’s news releases have contained statements regarding the potential impact of the Texas storm on the company’s ability to continue as a going concern since as early as February 22, 2021. A copy of the news release dated February 22, 2021 is attached to this affidavit as **Exhibit “L”**.

50. The information and documents relating to any proposed transaction must, out of necessity, be confidential to ensure a constructive dialogue with financial participants. It is not feasible to have other stakeholders “at the table” to second guess the Applicants or distract management from the task at hand. The Applicants, with the assistance of the Monitor, must exercise their business judgment to frame the negotiations and parties involved to achieve the desired outcome of a going concern transaction.

51. The Applicants and the Monitor have answered the reasonable and appropriate requests for information they have received to date. It is the Applicants’ view that Plaintiffs’ Counsel’s remaining information requests are overbroad, relate to confidential information about the business and restructuring, and/or are more akin to discovery questions that are not relevant to developing an understanding of the restructuring process. The Applicants continue to be willing to, in consultation with the Monitor, engage with Plaintiffs’ Counsel to address reasonable and appropriate requests for information.

E. Proposed Adjudication Schedule

52. Plaintiffs’ Counsel sent a proposed schedule to Osler on December 13, 2021 (the “**December Proposed Schedule**”), attached as Exhibit S to the Tannor Affidavit. The December Proposed Schedule suggested:

- (a) The appointment of a tripartite panel from JAMS (U.S.);
- (b) The application of the expedited procedures of the JAMS Comprehensive Arbitration Rules and Procedures governing binding Arbitrations of claims to pre-hearing discovery and the hearing;
- (c) “[S]ufficient disclosure” from the Just Energy Group;
- (d) “Circumscribed” depositions; and
- (e) A hearing lasting approximately 5-7 days to be scheduled for the first week of February 2022.

53. This proposal would have required the parties to start and complete documentary discovery, conduct depositions, prepare and exchange expert reports, and proceed to a hearing on the merits within a two-month period that included the December holiday break. The December Proposed Schedule was not a remotely achievable schedule, especially as the Applicants are in the midst of a critical time in their attempts to reorganize.

54. The December Proposed Schedule omits significant and substantive steps in the adjudication of any proposed class action. For instance, the schedule ignores the need to certify the proposed class actions in advance of any hearing on the merits. It is my understanding, including based on advice from U.S. counsel Mr. Cyrulnik, that, in the case of a class action, the court first needs to certify a class prior to any trial, including by making a determination as to whether the case satisfies the many requirements for proceeding as a class action and, if so, defining the precise scope of the permissible class based on consideration of the questions of law and fact that are common to the proposed class members. Without certifying the classes (the scope

of which are very much in contention given the plaintiffs' attempts to broaden the Putative Class Actions), it will be impossible to conduct a trial or give notice to potential class members to allow them to opt out if either of the Putative Class Actions is certified.

55. Plaintiffs' Counsel notes in their proposed schedule that they require disclosure of "information such as (i) the rates charged and usage data for Just Energy's customers in the various U.S. markets where the company supplies electricity and gas, (ii) JE's costing methodology, (iii) customer agreements utilized, and (iv) marketing materials" and that they are "prepared to furnish a more detailed list of what is needed pre-hearing." These statements conveniently gloss over the EDNY Court's ruling that discovery has been concluded in the Donin Action, as well as the fact that the named defendants in the Putative Class Actions only operated in certain jurisdictions. Similarly, Plaintiffs' Counsel ignores the fact that the time for submitting an expert report in the Donin Action has long passed.

56. The Notices of Disallowance delivered to the plaintiffs on January 11, 2022, both specified the significant steps that are required to be addressed in order to fairly and properly adjudicate the Putative Class Actions – most of which were missing from the plaintiffs' proposed adjudication schedule. In addition to the discovery that must be commenced and concluded in the Jordet Action, both actions require the completion of:

- dispositive motion practice (i.e., motion for summary judgment), which would involve the disclosure of any expert reports and supporting evidence from fact witnesses, depositions, potential preliminary motions, written briefs, and oral argument;
- a contested class certification process, which would include written briefing, presentation of supporting evidence from any fact and expert witnesses, and oral argument;

- a trial on the issue of liability, including pretrial submissions and motion practice to resolve evidentiary issues, voir dire, direct testimony and cross-examination of any fact and expert witnesses, and legal argument from counsel; and
- resolution of damages of the plaintiff or certified class(es), which may require bifurcation from the trial on liability (especially if the plaintiffs continue to allege damages on behalf of a national class, which the defendants argue is impermissible).

57. The plaintiffs' current proposed schedule, as set out in their notice of motion, is largely the same as the December Proposed Schedule. Notably, they are still seeking a hearing on the merits in February 2022 without accounting for the need to address discovery in the Jordet Action and motions for summary judgment and class certification in both Putative Class Actions.

58. On February 1, 2022, the Applicants provided the Applicants' proposed adjudication schedule to Plaintiffs' Counsel (the "**Applicants' Proposed Schedule**"). A copy of the communication to Plaintiffs' Counsel, including the Applicants' Proposed Schedule is attached to this affidavit as **Exhibit "M"**. The Applicants noted that they are willing to discuss the appointment of an arbitrator from Arbitration Place or similar forum as Claims Officer. I am advised by Osler that Arbitration Place has a roster that includes former Supreme Court of Canada and Ontario Court of Appeal judges. The Applicants' Proposed Schedule would be subject to the discretion of the Claims Officer.

59. The proposed expedited schedule for addressing both Putative Class Action Claims, along with the comparable schedule to adjudicate these Putative Class Actions in the ordinary course, is set out below:

Step	Applicants' Proposed Expedited Schedule	Potential Donin Schedule in the Ordinary Course	Potential Jordet Schedule in the Ordinary Course
Fact Discovery	After conducting a meet and confer among counsel, appropriately tailored document production by June 30, 2022 consistent with the status of the Donin and Jordet cases.	Completed/Deadline Passed	April 1, 2023
Expert Discovery	Opening Expert Disclosures: July 29, 2022 Rebuttal Expert Disclosures: August 19, 2022 Expert Depositions: August 29, 2022	Completed/Deadline Passed	Plaintiffs' Expert Disclosures: May 15, 2023 Defendants' Expert Disclosures: July 1, 2023 Expert Depositions: August 1, 2023
Dispositive Motions Hearing	November 10, 2022	September 3, 2022 (assuming pre-motion letters filed by March 3, 2022)	March 7, 2024 (assuming pre-motion letters filed September 7, 2023)
Class Certification Hearing	November 17, 2022	September 30, 2022 (assuming pre-motion letters filed March 31, 2022)	April 5, 2024 (assuming pre-motion letters October 5, 2023)
Joint Pretrial Order/Pretrial Conference	December 9, 2022	June 8, 2023	December 5, 2024
Trial	February 10, 2023	September 11, 2023	January 6, 2025

60. It is my understanding, including based on advice from Mr. Cyrulnik, that the schedules listed in the last two columns of the above chart may well be ambitious estimations of the “ordinary

course” schedules for hearing the Putative Class Actions, based on the assumptions set out in the relevant footnotes in the Applicants’ Proposed Schedule.

61. As a reference point, the Applicants’ compressed schedule provides for the hearing of the certification and summary judgment motions in November 2022, almost a year and a half before such motions would be heard in the Jordet Action in the ordinary course. If the plaintiffs are successful on both of these motions, a trial with respect to any certified common issues would commence by February 10, 2023 – approximately three years before any such trial would have been heard in the Jordet Action and seven months before any trial would have been heard in the Donin Action.

62. Management of the Applicants will be directly engaged in document production, attending depositions, and supervising and supporting litigation efforts in the Putative Class Actions at a time when they are focused on implementing a going concern restructuring for the business. The first step in the proposed schedule – document production – will be a burdensome step for management, as there has been no discovery in the Jordet Action to date. By way of illustration, document production in the Donin Action took nearly two years to complete. The preliminary list of disclosure requests sought by the plaintiffs is broad and confirms that the discovery process will not be a simple or quick exercise.

63. The Applicants’ Proposed Schedule was advanced in an effort to strike a balance between available management resources to both successfully conclude a restructuring transaction and the need to finalize creditor claims in a timely fashion. The complexity of developing a plan for the Applicants was recognized by this Court in granting the Applicants’ last request for a stay extension:

- 32 -

The company has been moving in good faith towards a plan, but the business is of such a complexity that it has taken longer than initially anticipated. This is not surprising. The company is subject to a myriad of regulatory regimes across the United States and Canada. It has complex commercial arrangements with suppliers and a number of secured and unsecured lenders, the integrity of which in turn depends on Just Energy's compliance with regulatory requirements.

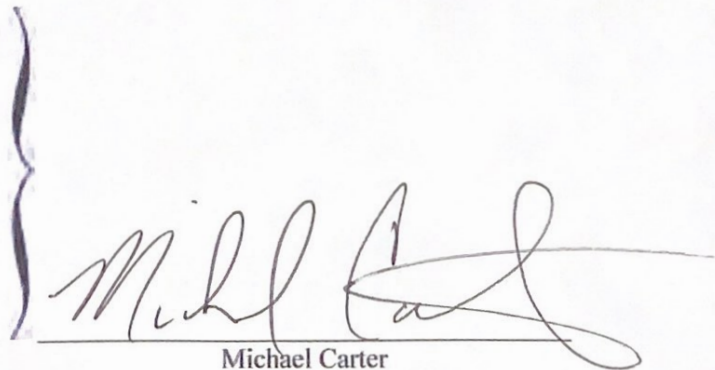
64. If anything, the time pressure imposed on management to negotiate a restructuring plan while operating the business has become even more intense and all consuming.

65. In the circumstances, the Applicants could not justify a more abridged timetable for adjudicating the Putative Class Actions. The restructuring negotiations of this billion-dollar company must continue to be the focus of management for the benefit of its stakeholders, including any potential class members. Management simply does not have the "bandwidth" to further accelerate the Applicants' Proposed Schedule, as this would undoubtedly be a distraction and strain on management resources during a critical phase of the restructuring. It is also imperative that any schedule allow for a full and fair consideration of the merits of the Putative Class Claims to ensure the integrity of the process and to avoid prejudice to unsecured creditors with competing claims.

SWORN BEFORE ME over video
teleconference this 2nd day of February, 2022
pursuant to O. Reg 431/20, Administering
Oath or Declaration Remotely. The affiant was
located in the Town of Flower Mound, in the
State of Texas while the Commissioner was
located in the City Toronto, in the Province of
Ontario.



Commissioner for Taking Affidavits
Karin Sachar (LSO No. 59944E)



Michael Carter

THIS IS **EXHIBIT “B”** REFERRED TO IN THE AFFIDAVIT OF MICHAEL CARTER SWORN BEFORE ME over video teleconference this 14th day of April, 2022 pursuant to O. Reg 431/20, Administering Oath or Declaration Remotely. The affiant was located in the Town of Flower Mound, in the State of Texas while the Commissioner was located in the City Toronto, in the Province of Ontario.



Commissioner for Taking Affidavits
Chloe Nanfara (LSO No. 79715G)

ONTARIO
SUPERIOR COURT OF JUSTICE

COMMERCIAL LIST

IN THE MATTER OF THE *COMPANIES' CREDITORS*
ARRANGEMENT ACT, R.S.C. 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF JUST ENERGY GROUP INC., JUST ENERGY CORP., ONTARIO ENERGY COMMODITIES INC., UNIVERSAL ENERGY CORPORATION, JUST ENERGY FINANCE CANADA ULC, HUDSON ENERGY CANADA CORP., JUST MANAGEMENT CORP., 11929747 CANADA INC., 12175592 CANADA INC., JE SERVICES HOLDCO I INC., JE SERVICES HOLDCO II INC., 8704104 CANADA INC., JUST ENERGY ADVANCED SOLUTIONS CORP., JUST ENERGY (U.S.) CORP., JUST ENERGY ILLINOIS CORP., JUST ENERGY INDIANA CORP., JUST ENERGY MASSACHUSETTS CORP., JUST ENERGY NEW YORK CORP., JUST ENERGY TEXAS I CORP., JUST ENERGY, LLC, JUST ENERGY PENNSYLVANIA CORP., JUST ENERGY MICHIGAN CORP., JUST ENERGY SOLUTIONS INC., HUDSON ENERGY SERVICES LLC, HUDSON ENERGY CORP., INTERACTIVE ENERGY GROUP LLC, HUDSON PARENT HOLDINGS LLC, DRAG MARKETING LLC, JUST ENERGY ADVANCED SOLUTIONS LLC, FULCRUM RETAIL ENERGY LLC, FULCRUM RETAIL HOLDINGS LLC, TARA ENERGY, LLC, JUST ENERGY MARKETING CORP., JUST ENERGY CONNECTICUT CORP., JUST ENERGY LIMITED, JUST SOLAR HOLDINGS CORP. AND JUST ENERGY (FINANCE) HUNGARY ZRT.

Applicants

AFFIDAVIT OF MICHAEL CARTER

I, Michael Carter, of the Town of Flower Mound, in the State of Texas, MAKE OATH
AND SAY:

1. I have been Just Energy Group Inc.'s ("**Just Energy**") Chief Financial Officer since September 2020. In that role, I am responsible for all financial-related aspects of the business of Just Energy and its subsidiaries in these CCAA proceedings (collectively, the "**Just Energy Group**" or the "**Applicants**"), including the partnerships listed on Schedule "A" of the Initial Order to which the protections and authorizations of the Initial Order were extended (collectively

with the Applicants, the “**Just Energy Entities**”). As such, I have personal knowledge of the matters deposed to in this affidavit, including the business and financial affairs of the Just Energy Entities. Where I have relied on other sources for information, I have stated the source of my information and I believe such information to be true.

2. I make this affidavit in support of the Applicants’ motion returnable on March 3, 2022, for a short extension of the Stay Period (as defined below) to, and including, March 25, 2022.

EXTENSION TO THE STAY PERIOD

3. The Initial Order granted a Stay Period until and including March 19, 2021. The Stay Period has subsequently been extended to June 4, 2021, September 30, 2021, December 17, 2021, February 17, 2022 and, most recently, March 4, 2022.

4. In support of the Just Energy Entities’ previous motion for a brief extension to the Stay Period heard by the Court on February 9, 2022, I swore an Affidavit that included a comprehensive discussion regarding the Just Energy Entities’ ongoing efforts to reach consensus with key stakeholders¹ holding more than \$1 billion CAD in funded debt regarding the terms and structure of a restructuring plan to facilitate the Just Energy Entities’ emergence from the current CCAA and Chapter 15 proceedings. A copy of my previous Affidavit, sworn February 2, 2022, excluding exhibits, is attached hereto as **Exhibit “A”**.

¹ Such key stakeholders include: (a) the four funds comprising the DIP Lenders in these CCAA proceedings (the “**DIP Lenders**”); (b) significant lenders under the First Amended and Restated Loan Agreement dated as of September 28, 2020 (the “**Term Loan Lenders**”); (c) the lenders under the ninth amended and restated credit agreement with Just Energy Ontario L.P. and Just Energy U.S., dated as of September 28, 2020 (the “**Credit Facility Lenders**”); (d) Shell Energy North America (Canada) Inc., Shell Energy North America (US), L.P., and Shell Trading Risk Management, LLC as significant Commodity Suppliers to, and secured creditors of, the Just Energy Entities (collectively, “**Shell**”); and (e) CBHT Energy I LLC in its capacity as assignee of all secured pre-filing, claims previously held by BP.

5. Since the Stay Period was last extended on February 9, 2022, the Just Energy Entities, in consultation with the Monitor, have continued to work hard to finalize their proposed restructuring plan and had anticipated applying for an Order on March 3, 2022, among other things, authorizing them to file a plan of compromise or arrangement (the “**Plan**”) for consideration by their creditors, and to call, hold and conduct meetings of creditors to consider and vote on resolutions to approve the Plan (the “**Meeting Order**”). However, because of the size and complexity of the Just Energy Entities’ business, and the complexity and time-consuming nature of multi-party negotiations, discussions are at a crucial stage and remain ongoing. The Just Energy Entities are accordingly seeking a short, three-week extension of the Stay Period up to and including March 25, 2022.

6. The Just Energy Entities have acted and continue to act in good faith and with due diligence in these CCAA proceedings and in working to develop a Plan to present to their creditors. The Just Energy Entities believe that the extension of the Stay Period is necessary and appropriate in the circumstances to provide the Just Energy Entities with an additional short period of time to seek to: (a) conclude their discussions with key stakeholders regarding the terms of a proposed Plan, (b) finalize the Plan, and (c) file a further motion with this Honourable Court for the Meeting Order.

7. I understand that prior to the hearing of this motion the Monitor will file a report (the “**Monitor’s Sixth Report**”) which will include, among other things, a cash flow forecast demonstrating that, subject to the underlying assumptions contained therein, the Just Energy Entities will have sufficient funds to continue their operations and fund these CCAA proceedings until March 25, 2022. I further understand that the Monitor's Sixth Report will recommend that the Stay Period be extended.

- 4 -

SWORN BEFORE ME over video teleconference this 1st day of March, 2022 pursuant to O. Reg 431/20, Administering Oath or Declaration Remotely. The affiant was located in the Town of Flower Mound, in the State of Texas while the Commissioner was located in the City Toronto, in the Province of Ontario.



Commissioner for Taking Affidavits



Michael Carter

Miao Sun, a Commissioner, etc.,
Province of Ontario, while a
Student-at-Law. Expires March 6,
2023.

THIS IS **EXHIBIT “C”** REFERRED TO IN THE AFFIDAVIT OF MICHAEL CARTER SWORN BEFORE ME over video teleconference this 14th day of April, 2022 pursuant to O. Reg 431/20, Administering Oath or Declaration Remotely. The affiant was located in the Town of Flower Mound, in the State of Texas while the Commissioner was located in the City Toronto, in the Province of Ontario.



Commissioner for Taking Affidavits
Chloe Nanfara (LSO No. 79715G)

ONTARIO
SUPERIOR COURT OF JUSTICE

COMMERCIAL LIST

IN THE MATTER OF THE *COMPANIES' CREDITORS*
ARRANGEMENT ACT, R.S.C. 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF JUST ENERGY GROUP INC., JUST ENERGY CORP., ONTARIO ENERGY COMMODITIES INC., UNIVERSAL ENERGY CORPORATION, JUST ENERGY FINANCE CANADA ULC, HUDSON ENERGY CANADA CORP., JUST MANAGEMENT CORP., 11929747 CANADA INC., 12175592 CANADA INC., JE SERVICES HOLDCO I INC., JE SERVICES HOLDCO II INC., 8704104 CANADA INC., JUST ENERGY ADVANCED SOLUTIONS CORP., JUST ENERGY (U.S.) CORP., JUST ENERGY ILLINOIS CORP., JUST ENERGY INDIANA CORP., JUST ENERGY MASSACHUSETTS CORP., JUST ENERGY NEW YORK CORP., JUST ENERGY TEXAS I CORP., JUST ENERGY, LLC, JUST ENERGY PENNSYLVANIA CORP., JUST ENERGY MICHIGAN CORP., JUST ENERGY SOLUTIONS INC., HUDSON ENERGY SERVICES LLC, HUDSON ENERGY CORP., INTERACTIVE ENERGY GROUP LLC, HUDSON PARENT HOLDINGS LLC, DRAG MARKETING LLC, JUST ENERGY ADVANCED SOLUTIONS LLC, FULCRUM RETAIL ENERGY LLC, FULCRUM RETAIL HOLDINGS LLC, TARA ENERGY, LLC, JUST ENERGY MARKETING CORP., JUST ENERGY CONNECTICUT CORP., JUST ENERGY LIMITED, JUST SOLAR HOLDINGS CORP. AND JUST ENERGY (FINANCE) HUNGARY ZRT.

Applicants

AFFIDAVIT OF MICHAEL CARTER

I, Michael Carter, of the Town of Flower Mound, in the State of Texas, MAKE OATH AND SAY:

1. I have been Just Energy Group Inc.'s ("**Just Energy**") Chief Financial Officer since September 2020. In that role, I am responsible for all financial-related aspects of the business of Just Energy and its subsidiaries in these CCAA proceedings (collectively, the "**Just Energy Group**" or the "**Applicants**"), including the partnerships listed on Schedule "A" of the Initial Order to which the protections and authorizations of the Initial Order were extended (collectively with the Applicants, the "**Just Energy Entities**"). As such, I have personal knowledge of the

matters deposed to in this affidavit, including the business and financial affairs of the Just Energy Entities. Where I have relied on other sources for information, I have stated the source of my information and I believe such information to be true.

2. I make this affidavit in support of the Applicants' motion returnable on March 24, 2022, for an extension of the Stay Period (as defined below) to, and including, April 22, 2022.

EXTENSION TO THE STAY PERIOD

3. The Initial Order granted a Stay Period until and including March 19, 2021 (the "**Stay Period**"). The Stay Period has subsequently been extended to June 4, 2021, September 30, 2021, December 17, 2021, February 17, 2022, March 4, 2022 and, most recently on March 3, 2022, to March 25, 2022.

4. In support of the Just Energy Entities' previous motions for brief extensions to the Stay Period heard by the Court on February 9 and March 3, 2022, I swore Affidavits that included a comprehensive discussion regarding the Just Energy Entities' ongoing efforts to reach consensus with key stakeholders¹ holding more than \$1 billion CAD in funded debt regarding the terms and structure of a restructuring plan to facilitate the Just Energy Entities' emergence from the current CCAA and Chapter 15 proceedings. Copies of my previous Affidavits, sworn February 2 and March 1, 2022, excluding exhibits, are attached hereto as **Exhibits "A" and "B"**.

¹ Such key stakeholders include: (a) the four funds comprising the DIP Lenders in these CCAA proceedings (the "**DIP Lenders**") under the CCAA Interim Debtor-in-Possession Financing Term Sheet dated as of March 9, 2021 (as amended, the "**DIP Term Sheet**"); (b) significant lenders under the First Amended and Restated Loan Agreement dated as of September 28, 2020 (the "**Term Loan Lenders**"); (c) the lenders under the ninth amended and restated credit agreement with Just Energy Ontario L.P. and Just Energy U.S., dated as of September 28, 2020 (the "**Credit Facility Lenders**"); (d) Shell Energy North America (Canada) Inc., Shell Energy North America (US), L.P., and Shell Trading Risk Management, LLC as significant Commodity Suppliers to, and secured creditors of, the Just Energy Entities (collectively, "**Shell**"); and (e) CBHT Energy I LLC in its capacity as assignee of all secured pre-filing claims previously held by BP.

5. Since the Stay Period was last extended on March 3, 2022, the Just Energy Entities, in consultation with the Monitor, have continued to work hard to finalize their proposed restructuring plan and had anticipated applying for an Order on or before March 25, 2022, among other things, authorizing them to file a plan of compromise or arrangement (the “**Plan**”) for consideration by their creditors, and to call, hold and conduct meetings of creditors to consider and vote on resolutions to approve the Plan (the “**Meeting Order**”). However, at this time, despite intensive efforts and continued progress on the restructuring discussions, no Plan has yet been finalized to allow the Just Entities to file a motion to seek a Meeting Order.

6. The Just Energy Entities are accordingly seeking an additional short extension of the Stay Period up to and including April 22, 2022. The Just Energy Entities currently intend to seek a Meeting Order authorizing them to file a Plan during this proposed extended Stay Period. If, notwithstanding the Just Energy Entities’ best efforts, they are unable to file a motion seeking a Meeting Order prior to April 22, 2022, the Just Energy Entities intend to seek direction from this Honourable Court regarding their ongoing restructuring efforts and these CCAA proceedings.

7. In order to accommodate the longer than anticipated timelines for finalization of the Plan and advancement of the Just Energy Entities’ restructuring efforts, the DIP Lenders have agreed to amend the milestone dates under the DIP Term Sheet as follows:

- Delivery of Recapitalization Term Sheet: extended to March 24, 2022;
- Meeting Order: extended to March 31, 2022;
- Mailing of Meeting Materials: extended to April 7, 2022;
- Meeting Order Recognition in Chapter 15 proceedings: extended to April 26, 2022;
- Creditors’ Meeting: extended to May 11, 2022;
- Sanction Order: extended to May 18, 2022; and

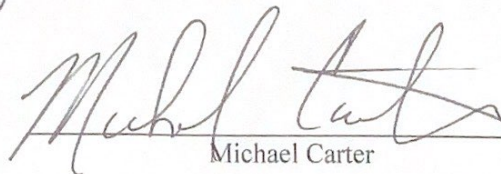
- 4 -

- Sanction Order Recognition in Chapter 15 proceedings: extended to June 2, 2022.
8. The Just Energy Entities will seek further extensions to the milestone dates, as necessary, to accommodate the status of negotiations leading up to April 22, 2022.
9. The Just Energy Entities have acted and continue to act in good faith and with due diligence in these CCAA proceedings and in working to develop a Plan to present to their creditors. The Just Energy Entities believe that the extension of the Stay Period is necessary and appropriate in the circumstances to provide the Just Energy Entities with an additional short period of time to seek to: (a) conclude their discussions with key stakeholders regarding the terms of a proposed Plan, (b) finalize the Plan, and (c) file a further motion with this Honourable Court for the Meeting Order.
10. I understand that prior to the hearing of this motion the Monitor will file a report (the “**Monitor’s Seventh Report**”) which will include, among other things, a cash flow forecast demonstrating that, subject to the underlying assumptions contained therein, the Just Energy Entities will have sufficient funds to continue their operations and fund these CCAA proceedings until April 22, 2022. I further understand that the Monitor's Seventh Report will recommend that the Stay Period be extended.

SWORN BEFORE ME over video
teleconference this 21st day of March, 2022
pursuant to O. Reg 431/20, Administering
Oath or Declaration Remotely. The affiant was
located in the Town of Flower Mound, in the
State of Texas while the Commissioner was
located in the City Toronto, in the Province of
Ontario.



Commissioner for Taking Affidavits
Chloe Nanfara (LSO No. 79715G)



Michael Carter

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985, C. C- 36, AS AMENDED; Court File No: CV-21-00658423-00CL

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF JUST ENERGY GROUP INC. ET AL.

Applicants

Ontario
**SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

Proceeding commenced at: TORONTO

AFFIDAVIT OF MICHAEL CARTER

OSLER, HOSKIN & HARCOURT LLP
100 King Street West, 1 First Canadian Place
Suite 6200, P.O. Box 50
Toronto ON M5X 1B8

Marc Wasserman (LSO# 44066M)
Michael De Lellis (LSO# 48038U)
Jeremy Dacks (LSO# 41851R)

Tel: (416) 362-2111
Fax: (416) 862-6666

Counsel for the Applicants

TAB 3

Court File No. CV-21-00658423-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

THE HONOURABLE)	THURSDAY, THE 21 st
)	
JUSTICE MCEWEN)	DAY OF APRIL, 2022

IN THE MATTER OF THE *COMPANIES' CREDITORS*
ARRANGEMENT ACT, R.S.C. 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF JUST ENERGY GROUP INC., JUST ENERGY CORP., ONTARIO ENERGY COMMODITIES INC., UNIVERSAL ENERGY CORPORATION, JUST ENERGY FINANCE CANADA ULC, HUDSON ENERGY CANADA CORP., JUST MANAGEMENT CORP., 11929747 CANADA INC., 12175592 CANADA INC., JE SERVICES HOLDCO I INC., JE SERVICES HOLDCO II INC., 8704104 CANADA INC., JUST ENERGY ADVANCED SOLUTIONS CORP., JUST ENERGY (U.S.) CORP., JUST ENERGY ILLINOIS CORP., JUST ENERGY INDIANA CORP., JUST ENERGY MASSACHUSETTS CORP., JUST ENERGY NEW YORK CORP., JUST ENERGY TEXAS I CORP., JUST ENERGY, LLC, JUST ENERGY PENNSYLVANIA CORP., JUST ENERGY MICHIGAN CORP., JUST ENERGY SOLUTIONS INC., HUDSON ENERGY SERVICES LLC, HUDSON ENERGY CORP., INTERACTIVE ENERGY GROUP LLC, HUDSON PARENT HOLDINGS LLC, DRAG MARKETING LLC, JUST ENERGY ADVANCED SOLUTIONS LLC, FULCRUM RETAIL ENERGY LLC, FULCRUM RETAIL HOLDINGS LLC, TARA ENERGY, LLC, JUST ENERGY MARKETING CORP., JUST ENERGY CONNECTICUT CORP., JUST ENERGY LIMITED, JUST SOLAR HOLDINGS CORP. AND JUST ENERGY (FINANCE) HUNGARY ZRT.

(each, an “**Applicant**”, and collectively, the “**Applicants**”)

**ORDER
(Stay Extension)**

THIS MOTION, made by the Applicants pursuant to the *Companies’ Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the “**CCAA**”), for an order extending the Stay Period (as defined in paragraph 17 of the Second Amended and Restated Initial Order, granted May 26, 2021) was heard this day by judicial video conference via Zoom in Toronto, Ontario due to the COVID-19 pandemic.

ON READING the Notice of Motion of the Applicants, the Affidavit of Michael Carter sworn April 14, 2022, including the exhibits thereto, the Eighth Report of FTI Consulting Canada Inc. in its capacity as monitor (the “**Monitor**”) dated April 7, 2022 (the “**Eighth Report**”), the Ninth Report of the Monitor dated ● (the “**Ninth Report**”), and on hearing the submissions of respective counsel for the Applicants, the Monitor, and such other counsel as were present, no one else appearing although duly served as appears from the Affidavit of Service of ●, affirmed April ●, 2022, filed:

SERVICE

1. **THIS COURT ORDERS** that the time for service of the Notice of Motion and the Motion Record herein is hereby abridged and validated so that this Motion is properly returnable today and hereby dispenses with further service thereof.

STAY EXTENSION

2. **THIS COURT ORDERS** that the Stay Period is hereby extended until and including May 26, 2022.

APPROVAL OF MONITOR’S REPORT

3. **THIS COURT ORDERS** that that the activities and conduct of the Monitor prior to the date hereof in relation to the Applicants and these CCAA proceedings are hereby ratified and approved.

4. **THIS COURT ORDERS** that the Eighth Report and the Ninth Report be and are hereby approved.

5. **THIS COURT ORDERS** that only the Monitor, in its personal capacity and only with respect to its own personal liability, shall be entitled to rely upon or utilize in any way the approvals set forth in paragraphs 3 and 4 of this Order.

GENERAL

6. **THIS COURT ORDERS** that this Order shall have full force and effect in all provinces and territories in Canada.

7. **THIS COURT HEREBY REQUESTS** the aid and recognition of any court, tribunal, regulatory or administrative body, having jurisdiction in Canada or in the United States of America to give effect to this Order and to assist the Applicants, the Monitor and their respective agents in carrying out the terms of this Order. All courts, tribunals, regulatory and administrative bodies are hereby respectfully requested to make such orders and to provide such assistance to the Applicants and to the Monitor, as an officer of this Court, as may be necessary or desirable to give effect to this Order, to grant representative status to the Monitor in any foreign proceeding, or to assist the Applicants and the Monitor and their respective agents in carrying out the terms of this Order.

**IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C.
1985, C. C-36, AS AMENDED**

Court File No: CV-21-00658423-00CL

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF JUST
ENERGY GROUP INC., *et al.***

Applicants

Ontario
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST

Proceeding commenced at Toronto

ORDER
(Stay Extension)

OSLER, HOSKIN & HARCOURT LLP
100 King Street West, 1 First Canadian Place
Suite 6200, P.O. Box 50
Toronto ON M5X 1B8

Marc Wasserman - LSO# 44066M
Email: mwasserman@osler.com

Michael De Lellis - LSO# 48038U
Email: mdelellis@osler.com

Jeremy Dacks - LSO# 41851R
Email: jdacks@olser.com

Tel: 416.362.2111
Fax: 416.862.6666

Counsel for the Applicants

**IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C.
1985, C. C-36, AS AMENDED**

Court File No: CV-21-00658423-00CL

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF JUST
ENERGY GROUP INC., *et al.***

Applicants

Ontario
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST

Proceeding commenced at Toronto

MOTION RECORD OF THE APPLICANTS
(Motion for Stay Extension)

OSLER, HOSKIN & HARCOURT LLP
100 King Street West, 1 First Canadian Place
Suite 6200, P.O. Box 50
Toronto ON M5X 1B8

Marc Wasserman - LSO# 44066M
Email: mwasserman@osler.com

Michael De Lellis - LSO# 48038U
Email: mdelellis@osler.com

Jeremy Dacks - LSO# 41851R
Email: jdacks@olser.com

Tel: 416.362.2111
Fax: 416.862.6666

Counsel for the Applicants