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July 30, 2025

**VIA ELECTRONIC DELIVERY**

Ms. Amy Sweeney  
Director, Office of Regulation, Analysis, and Engagement (FE-34)  
Office of Resource Sustainability  
Office of Fossil Energy and Carbon Management  
U.S. Department of Energy  
1000 Independence Avenue, S.W.  
Washington, D.C. 20585  
[fergas@hq.doe.gov](mailto:fergas@hq.doe.gov)

**Re:** Hudson Energy Services, LLC, FE Docket No. 25-82-NG  
Just Energy New York Corp., FE Docket No. 23-59-NG  
Just Energy Ontario L.P., FE Docket No. 23-60-NG and FE Docket No. 25-93-NG  
**Notice of Change in Control and Amendment to Pending Applications**

Dear Ms. Sweeney:

Pursuant to the U.S. Department of Energy (“DOE”), Office of Fossil Energy and Carbon Management’s (“DOE/FECM”) authorizations in the referenced dockets and the DOE/FECM CIC Procedures,<sup>1</sup> Hudson Energy Services, LLC (“Hudson”), Just Energy New York Corp. (“JENY”), and Just Energy Ontario L.P. (“JEO”), together the “Just Energy Entities”, hereby submit the following Notice of Change in Control and Amendment to Pending Applications (“Notice”).

**Background**

As summarized in the table below, each of the Just Energy Entities is authorized to import and export natural gas from and to Canada, a nation with which there is in effect a free trade agreement (“FTA”) requiring national treatment for trade in natural gas, pursuant to transactions that have terms of not greater than two years.

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<sup>1</sup> U.S. Dep’t of Energy, Procedures for Changes in Control Affecting Applications and Authorizations to Import or Export Natural Gas, 79 Fed. Reg. 65,541 (Nov. 5, 2014) (“DOE/FECM CIC Procedures”).

Just Energy Entity	Docket No.	Order No.	Volume
Hudson	25-82-NG	5319 <sup>2</sup>	200 billion cubic feet (“Bcf”)
JENY	23-59-NG	5017	100 Bcf
JEO	23-60-NG 25-93-NG	5016 Pending <sup>3</sup>	200 Bcf

### **Description of Transaction**

The transaction results in a change in control of the ultimate upstream parent of the Just Energy Entities. The Just Energy Entities are directly or indirectly wholly owned by Just Energy (U.S.) Corp. (“JEUS”). JEUS merged with a newly formed subsidiary of Interstate Gas Supply, LLC (“IGS”) for the purpose of engaging in the transaction. Following the transaction, IGS Ventures, Inc., the upstream parent of IGS, will be the owner of JEUS and all of its subsidiaries. As such, the Just Energy Entities are no longer owned by various private investment funds managed by Pacific Investment Management Company LLC.

The transaction was authorized by the Federal Energy Regulatory Commission (“FERC”) on June 2, 2025.<sup>4</sup> The transaction was consummated on July 1, 2025. Notices regarding the transaction were also submitted to the relevant regulatory authorities.<sup>5</sup>

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<sup>2</sup> As of July 30, 2025, the status of this application remains pending with an issue date recorded on July 23, 2025. We respectfully request that this Notice be deemed sufficient to satisfy the requirements for amending pending applications, if applicable at the time of submission.

<sup>3</sup> DOE/FECM Order No. 5016 is currently active through August 27, 2025. On July 24, 2025, JEO applied in Docket No. 25-93-NG for approval of import and export authority for an additional two-year term. We respectfully request that this Notice be deemed sufficient to satisfy the requirements for amending pending applications.

<sup>4</sup> *Interstate Gas Supply LLC, et al.*, 191 FERC ¶ 62,140 (2025). JEUS is also the parent company of the following entities listed as applicants in the *Application for Authorization Under Section 203 of the Federal Power Act, Requests for Waivers, Shortened Notice Period, Expedited Review, and Confidential Treatment*: Just Energy Pennsylvania Corp. (“Just Energy PA”), Just Energy Solutions Inc. (“Just Energy Solutions”), Just Energy Texas I Corp. (“Just Energy TX”), Just Energy Illinois Corp. (“Just Energy IL”), and Just Energy Limited (“JEL”). We note that these entities were included in the transaction, however, these entities do not have the same authorization to import or export natural gas to and from Canada and are therefore not a part of this Notice.

<sup>5</sup> IGS, JEUS, or their respective subsidiaries submitted various notices to relevant regulatory authorities, including a Notice of Change to Corporate Structure to the Ontario Energy Board and a Notice of Consummation to FERC on July 8, 2025.

## **Notice of Change in Control**

The DOE/FECM CIC Procedures state that a change in control

mean[s] a change, directly or indirectly, of the power to direct the management or policies of an entity whether such power is exercised through one or more intermediary companies or pursuant to an agreement, written or oral, and whether such power is established through ownership or voting of securities, or common directors, officers, or stockholders, or voting trusts, holding trusts, or debt holdings, or contract, or any other direct or indirect means.<sup>6</sup>

A rebuttable presumption that control exists arises from the ownership or power to vote, directly or indirectly, 10 percent or more of the voting securities of such entity.<sup>7</sup>

The procedures for notifying DOE/FECM of a change in control are set forth in the DOE/FECM CIC Procedures, pursuant to which a holder of an export authorization may notify DOE/FECM of a transaction by submitting a statement of change in control to DOE/FECM no later than 30 days after such changes have been effectuated.<sup>8</sup>

Upon receipt of a statement of a change in control for a long-term FTA natural gas import or export authorization, DOE will give immediate effect to the change in control and take no further action.<sup>9</sup> Although the DOE/FECM CIC Procedures explicitly apply to long-term import and export authorizations, the Just Energy Entities respectfully request that DOE/FECM provide the same treatment to their short-term, blanket import and export authorizations.<sup>10</sup>

## **Conclusion**

For the foregoing reasons, the Just Energy Entities respectfully request that the DOE/FECM give effect to the change in control described herein.

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<sup>6</sup> DOE/FECM CIC Procedures at 65,542.

<sup>7</sup> *Id.*

<sup>8</sup> *Id.*

<sup>9</sup> *Id.*

<sup>10</sup> See Cameron LNG, LLC *et al.*, DOE/FECM Order No. 4815, Docket Nos. 11-145-LNG *et al.*, at 7 (May 3, 2022) (applying DOE/FECM CIC Procedures to short-term blanket FTA import and export authorizations).

Please contact the undersigned with any questions regarding this Notice. Thank you for your attention to this matter.

Respectfully submitted,

/s/ Caileen Gamache

Caileen Gamache  
Alexandra J. Ward  
*Counsel for the Just Energy Entities*

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list in this proceeding.

Dated at San Francisco, CA this 30th day of July, 2025.

/s/ Alexandra J. Ward

Alexandra J. Ward

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