

DOCKETED

Docket Number:	18-IRP-01
Project Title:	Integrated Resource Plan
TN #:	224348
Document Title:	Just Energy Solutions Inc. 2018 Integrated Resource Plan - Public Version
Description:	IRP Alt. LSE Plan 2017 - public version of IRP plan attachments excluded.
Filer:	Inger Goodman
Organization:	Just Energy Solutions Inc.
Submitter Role:	Applicant
Submission Date:	8/1/2018 4:41:01 PM
Docketed Date:	8/1/2018

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Develop an
Electricity Integrated Resource Planning
Framework and to Coordinate and Refine Long-
Term Procurement Planning Requirements

Rulemaking 16-02-007
(Filed February 19, 2016)

**JUST ENERGY SOLUTIONS INC.
2018 INTEGRATED RESOURCE PLAN**

PUBLIC VERSION

August 1, 2018

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Just Energy Solutions Inc., (“Just Energy”) an Electric Service Provider (“ESP”) registered with the Commission, ESP No. 1092, provides this Type 1 Alternative LSE Plan (“Plan”) pursuant to D.18-02-018 (“Decision”), Ordering Paragraph No. 14. Just Energy is a small Load Serving Entity (LSE), with an annual load forecast that is less than 700 gigawatt hours in any of the first five years of the integrated resource plan planning horizon. This IRP follows the format and responds to the requirements listed in Ordering Paragraph 14 of D.18-02-018. The public version of Just Energy’s 2018 IRP does not provide confidential Appendices A, B, C, D and E.

Just Energy is a California corporation that has been operating since 1998 and currently serve a small load of mainly small commercial and residential electric customers in California. We also serve about 80,000 gas customers in the State. Just Energy does not own and is not developing any existing or new generation at this time. Instead, Just Energy purchases it’s required resources through third-party contractual agreements to meet California capacity, energy storage and renewable energy compliance requirements, including requirements to

procure a minimum amount of long-term contracts. Customer contracts are typically set up on a month-to-month basis or under a one-year term length. Only a small amount of our customers are under long-term contracts. Due to the current suspension and cap on electric retail competition in California, Just Energy expects that its load will not grow and expect customer count to decline in the future. Just Energy is a supporter of renewable energy and energy efficiency measures and appreciate the Commission's efforts in the Integrated Resource Plan (IRP) process. We understand that the process for calculating GHG planning targets will require close collaboration among all parties to achieve the state's GHG reduction goals. Just Energy is utilizing the IRP process as a comprehensive support tool and road map for meeting company and its state specific objectives of providing reliable and least-cost electric service to all of our customers while also identifying the substantial risks and uncertainties inherent in the California market place. Just Energy is hereby submitting their Alternative Integrated Resource Plan (IRP).

1. California Energy Commission (CEC) Form S1.

Just Energy's CEC Form S1 and load forecast information is attached as confidential Appendix A. To determine current and future load size for the IRP process, Just Energy utilized information and data previously provided as part of the CPUC Year Ahead Resource Adequacy reporting process. The calculations do not include generation procured in relation to RPS. Those are however included in Appendix E.

2. CEC Form S2 or Energy Information Administration (EIA) Form 861 or EIA Form 861S.

Just Energy's EIA Form 861 (2017 data) filed in April 2018 is attached as confidential Appendix B.

3. CEC Power Content Report.

Just Energy's 2017 Power Content Report is attached as confidential Appendix C.

4. Greenhouse Gas Calculator for IRP V1.4.5

Just Energy's GHG Calculator tool is attached as confidential Appendix D.

5. Just Energy's Baseline Resources Calculator

Just Energy's Baseline Calculator tool is attached as confidential Appendix E.

6. A description of the treatment of disadvantaged communities, as required in Ordering Paragraph 6 above.

Just Energy compared designated disadvantaged zip codes with that of the zip codes available in our billing system to determine amount of customers served in these communities. Over 2,000 of our residential and small commercial customers resides within these communities. This is about one third of the customers served by Just Energy. We believe this number to be skewed due to the fact that a zip code alone doesn't identify a specific disadvantaged area within a city. In California, many zip codes spans over various types of communities. Thus, this number should be considered highly estimated.

Just Energy supports energy efficiency efforts in many states including California but due to the current suspension of electric competition in California, find it risky to make such investments in California. Thus, we currently don't provide any special emission reduction offers to electric residential customers located in these communities. We do offer green mix products to commercial customers per customer request. We also serve commercial customers that have energy storage and participate in the IOU's demand response program but such customer specific

information is not readily available to Just Energy as the programs are managed by the IOU and often customer specific data is not shared or not easily obtained.

Just Energy is also an active certified natural gas Core Transport Agent in California and as such offer various energy efficiency products that improves both the customer's electric and gas footprint. We also offset 100% of our residential customer natural gas usage with renewable carbon offsets. Just Energy also provide several types of programs that reduces greenhouse gas in markets that are open for competition, including smart thermostats, demand response and energy efficiency products. The cost related to these programs are for the most part included in the customer's energy price or can be billed to the customer over time.

With the exception of RPS procurement, Just Energy does not directly contract with generators for the bulk of its energy and capacity procurement needs. Resources are bought utilizing third-parties or CAISO. Therefore, Just Energy cannot provide a "separate accounting for resources located in disadvantaged communities."

7. A description of how planned future procurement is consistent with the Greenhouse Gas Planning Price or its individual Greenhouse Gas Benchmark.

Just Energy is extending its current 2019 Resource Adequacy load forecast through 2030. Please note that our load is highly variable as shown in CEC form S1 and we believe actual load will decline unless there is a change in the current competitive market place. Please see Appendix D, Just Energy's Greenhouse gas calculator for details. Just Energy is using the adopted GHG benchmarks for its IRP planning and provides the following emission calculation utilized to obtain Just Energy's average emission intensity. Redacted for confidentiality reasons.

Confidential Table 1 – Just Energy’s Average Emission Intensity Data Calculation

IOU Service Territory	DA Load in IOU’s Service Territory in GWh	Just Energy’s 2030 Forecast Load (GWh)	DA Load in IOU’s Service Territory in GWh	DA Load 2030 GHG Emissions Benchmark (MMT)	Just Energy’s % DA Load in IOU’s Service Territory	Just Energy’s Pro-Rata Share of GHG Emissions Benchmark (MMT)
PG&E	9,520		9,520	1.691		
SCE	11,618		11,618	2.035		
SDG&E	3,562		3,562	0.740		
Statewide Total	24,700		24,700	4.466		

8. A Conforming Portfolio consistent with the Reference System Portfolio.

Just Energy plans to undertake future procurement consistent with the Reference System Portfolio and other State programs.

9. A description of any alternative or preferred portfolios along with identification and justification for any deviations in assumptions from the Reference System Portfolio.

Just Energy anticipates that its procurement will be consistent with the Reference System Portfolio and plan to meet or exceed RPS requirement obligations in the current and future reporting periods. Due to our small footprint, there may be a need to undertake procurement that differ from the Reference System Portfolio (“RSP”) as that is mainly tailored to large LSEs. For small LSEs, the loss of one single commercial customer can have a large impact on overall cost to operate.

10. A description of how the LSE’s preferred portfolio is consistent with each relevant statutory and administrative requirement.

Although Just Energy may have to deviate slightly from the RSP, Just Energy will continue to meet all their existing statutory and/or regulatory obligations for certain types of resources, including renewables, storage, and resource adequacy. We will always strive to procure energy at the lowest cost while still meeting compliance rules and providing the lowest cost to our customers.

11. An action plan that includes all of the actions the LSE proposes to take in the next one to three years to implement its plan.

Per the Greenhouse Gas Calculator, Just Energy holds a negative average emission intensity from 2018 through 2030. Just Energy will continue to invest in procurement consistent with that of the RSP and strive to make economically feasible renewable energy alternatives for our customers to ensure we maintain or improve on our overall footprint.

12. A description of any barriers and lessons learned from the prior IRP and/or procurement cycle.

California market realities and uncertainties make it impossible for Just Energy to set future procurement goals with certainty. Funding around energy efficiency and Demand Response program currently available to other LSEs are not available to ESPs and make it difficult for companies like Just Energy to offer such products to our customers at a competitive and attractive rate. Just Energy do appreciate the Commission's goals for integrated resource planning and optimizing LSE procurement going forward but realize that a "one-size fits-all" approach is not practical. Creating difficulties in managing procurement in specific pockets rather than an overall market will increase operational costs that will have a direct impact on our cost to serve. Also, the Commission should review rounding formulas in the GHG calculator to

ensure a small LSE is not assigned a higher emission factor or percentage than that of the larger LSEs.

13. Conclusion

Just Energy submits this IRP in accordance with D.18-02-018

Dated: August 1, 2018

Respectfully Submitted



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VERIFICATION

I am the Regulatory Manager for Just Energy Solutions Inc. (“Just Energy”) and I am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 1, 2018 at La Palma, California.



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**Appendix A: California Energy Commission (CEC) 2017 IEPR Form S1 and
Just Energy's projected forecast derived from RA YA reports.
*Confidential***

**Appendix B: Just Energy's Energy Information Administration (EIA) Form
861.
*Confidential***

Appendix C: Just Energy's CEC Power Content Report.
Confidential

Appendix D: Just Energy's Greenhouse Gas Calculator for IRP V1.4.5.

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Appendix E: Just Energy's Baseline Resources Calculator. Appendix E.

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