



**VIA ELECTRONIC SERVICE**

January 31, 2022

Luly E. Massaro, Commission Clerk  
State of Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, Rhode Island 02888

**Re: Docket 5073 – Petition of Retail Energy Supply Association for Implementation of Purchase of Receivables Program**

Dear Ms. Massaro:

Direct Energy Services, LLC; Direct Energy Business, LLC and Direct Energy Business Marketing, LLC (collectively “Direct Energy”) respectfully submits this brief letter in lieu of written testimony regarding the above-referenced docket.

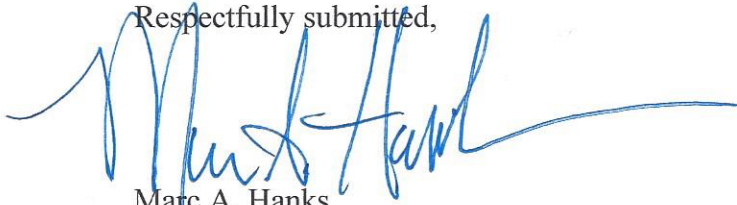
Consistent with its past comments, Direct Energy asserts that a well-designed Purchase of Receivables (“POR”) program is a major contributory factor in support of retail market development that will inure to the benefit of the state’s electricity consumers, most notably the residential customer class. Moreover, the POR billing mechanism enables Non-regulated Power Producers (“NPPs”) to more cost-effectively serve customers, especially the residential and small commercial market segments, by fundamentally reducing the risk of non-payment. Specifically, NPPs will be able to avoid costly credit screening and selective enrollment processes as well as eliminating the need for customers to post security deposits. As a result, the implementation of a POR program will provide electricity consumers with greater access to innovative pricing products and related energy services offered in the competitive retail market. Further, POR implementation will unpin and advance Rhode Island’s nascent municipal aggregation program that will directly benefit many of the state’s leading municipalities and their citizenry.

Direct Energy has reviewed the Narragansett Electric Company d/b/a National Grid (“National Grid”) Purchase of Receivables Program Filing dated January 7, 2022 and finds the filing to be generally acceptable. More specifically, pursuant to R.I. Gen. Laws 39-1-27.3, and National Grid’s Terms and Conditions for Municipal Aggregators, R.I.P.U.C. No. 2248 and Terms and Conditions for Nonregulated Power Producers, R.I.P.U.C. No. 2249, approved by the Commission during its December 21, 2021, and as modified during the Commission’s discussion during the Open Meeting and submitted with the Commission on December 23, 2021, Direct Energy finds the proposed National Grid calculation of the Standard Complete Billing

Percentages (“SCBPs”) to be generally acceptable. Finally, National Grid has proposed an effective POR implementation date beginning on or around February 18, 2022. While Direct Energy finds the implementation date to be acceptable, a brief extension in time until March 1, 2022 would be highly beneficial to effectively communicate to its existing customers the change to a POR market.

Thank you for the opportunity to provide these comments for your review and consideration.

Respectfully submitted,



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cc: Service List, Dockets 5073 – Petition of Retail Energy Supply Association for Implementation of Purchase of Receivables Program