

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION**

IN RE: RETAIL ENERGY SUPPLY	:	DOCKET NO. 5073
ASSOCIATION PETITION FOR	:	
IMPLEMENTATION OF PURCHASE OF	:	
RECEIVABLES PROGRAM	:	
	:	
	:	
	:	
	:	
	:	
	:	OCTOBER 27, 2020

**MOTION TO INTERVENE OF DIRECT ENERGY BUSINESS, LLC, DIRECT  
ENERGY BUSINESS MARKETING, LLC  
AND DIRECT ENERGY SERVICES, LLC**

Direct Energy Business, LLC, Direct Energy Business Marketing, LLC and Direct Energy Services, LLC (collectively “Direct Energy”), by its undersigned counsel, hereby moves to intervene in this matter. In support of its motion, Direct Energy states as follows:

1. Direct Energy is a nonregulated power producer (“NPP”) as defined in Rhode Island General Laws (“R.I.G.L.”) § 39-1-27.1 registered with the Division of Public Utilities and Carriers (the “Division”) to offer competitive electric generation service in the State of Rhode Island and Providence Plantations. Direct Energy serves both residential, commercial and industrial electric customers in the state of Rhode Island.

2. On September 16, 2020, the Retail Energy Supply Association (“RESA”) filed a petition requesting that the Division direct the electric distribution companies (“EDCs”) to implement a purchase of receivables program (“Program”), pursuant to which the EDCs would purchase the accounts receivables of NPPs such as Direct Energy.

3. Commission Rule 1.13(b) provides in pertinent part that “any person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate may intervene in any proceeding before the Commission.” Rule 1.13(b)(2) further states that such a right or an interest may be: “... an interest which may be directly affected and which is not

adequately represented by existing parties and as to which movants may be bound by the Commission's action in the proceeding." Rule 1.13(b)(3) additionally provides that such right or interest may be "any other interest of such nature that movant's participation may be in the public interest."

4. To further advance retail electricity competition and consumer choice, Direct Energy has been a leading advocate of well-designed and implemented POR programs in the Commonwealths of Massachusetts and Pennsylvania, as well as, other restructured states that include New York, Connecticut, Delaware, Illinois, New Jersey, Ohio and Maryland. Accordingly, Direct Energy plans to contribute its extensive professional expertise and experience in this proceeding with the goal of increasing the numbers of customers, especially residential and small commercial customers, having the opportunity to choose from a wide array of innovative products and services offered by competitive suppliers.

5. As a leading marketer of retail electricity supply to residential, commercial and industrial consumers in Rhode Island, Direct Energy has a substantial number of customers under contractual agreement and thus, has a unique business interest in this proceeding that cannot be adequately represented by another party. The recommendations put forth in RESA's proposed Program, especially regarding the design, costs and benefits of Program, if approved by the Commission, will materially alter the economics of the retail electric supply market, thereby directly impacting Direct Energy's ability to effectively compete and operate in the Rhode Island market for electric service.

WHEREFORE, pursuant to standards articulated in Rule 1.13, Direct Energy respectfully moves for intervention as a full party in Docket No. 5073.

Respectfully Submitted,

DIRECT ENERGY BUSINESS, LLC, DIRECT ENERGY  
BUSINESS MARKETING, LLC, AND  
DIRECT ENERGY SERVICES, LLC

*/s/ Joseph A. Farside, Jr.*

Date: October 27, 2020

---

Joseph A. Farside, Jr. (#7559)  
LOCKE LORD LLP  
2800 Financial Plaza  
Providence, RI 02903  
(401) 274-9200  
(401) 276-6611 (Fax)  
[joseph.farside@lockelord.com](mailto:joseph.farside@lockelord.com)

**CERTIFICATE OF SERVICE**

This is to certify that on the 27th day of October 2020, I sent a true copy of the foregoing to the attached service list.

*/s/Joseph A. Farside, Jr.*

---

Joseph A. Farside, Jr.

**Docket No. 5073 – Retail Energy Supply Associations Petition for Implementation of Purchase of Receivables Program  
Service List updated 9//30/2020**

<b>Name/Address</b>	<b>E-mail Distribution</b>	<b>Phone</b>
Ryan M. Murphy, Esq. Eckert Seamans Cherin & Mellott, LLC. Two International Place, 16 <sup>th</sup> Floor Boston, MA 02110	<a href="mailto:rmmurphy@eckertseamans.com">rmmurphy@eckertseamans.com</a> ;	617-342-6884
	<a href="mailto:CWaksler@eckertseamans.com">CWaksler@eckertseamans.com</a> ;	
	<a href="mailto:Kmoury@eckertseamans.com">Kmoury@eckertseamans.com</a> ;	
	<a href="mailto:DODell@eckertseamans.com">DODell@eckertseamans.com</a> ;	
Raquel Webster, Esq. National Grid. 280 Melrose St. Providence, RI 02907	<a href="mailto:Raquel.webster@nationalgrid.com">Raquel.webster@nationalgrid.com</a> ;	781-907-2121
	<a href="mailto:Andrew.Marcaccio@nationalgrid.com">Andrew.Marcaccio@nationalgrid.com</a> ;	
	<a href="mailto:Jennifer.hutchinson@nationalgrid.com">Jennifer.hutchinson@nationalgrid.com</a> ;	
	<a href="mailto:Juliana.Griffiths@nationalgrid.com">Juliana.Griffiths@nationalgrid.com</a> ;	
Leo Wold, Esq. John Spirito, Esq. Division of Public Utilities and Carriers	<a href="mailto:Leo.wold@dpuc.ri.gov">Leo.wold@dpuc.ri.gov</a> ;	
	<a href="mailto:John.spirito@dpuc.ri.gov">John.spirito@dpuc.ri.gov</a> ;	
	<a href="mailto:Margaret.L.Hogan@dpuc.ri.gov">Margaret.L.Hogan@dpuc.ri.gov</a> ;	
	<a href="mailto:John.bell@dpuc.ri.gov">John.bell@dpuc.ri.gov</a> ;	
	<a href="mailto:Joel.Munoz@dpuc.ri.gov">Joel.Munoz@dpuc.ri.gov</a> ;	
	<a href="mailto:dmacrae@riag.ri.gov">dmacrae@riag.ri.gov</a> ;	
<b>File an original &amp; 9 copies w/:</b> Luly E. Massaro, Commission Clerk Cynthia Wilson-Frias, Counsel Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a> ;	401-780-2017
	<a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov</a> ;	
	<a href="mailto:Cynthia.WilsonFrias@puc.ri.gov">Cynthia.WilsonFrias@puc.ri.gov</a> ;	
	<a href="mailto:Todd.bianco@puc.ri.gov">Todd.bianco@puc.ri.gov</a> ;	
	<a href="mailto:John.harrington@puc.ri.gov">John.harrington@puc.ri.gov</a> ;	
Office of Energy Resources Albert Vitali, Esq. Nicholas Ucci Christopher Kearns	<a href="mailto:Nicholas.ucci@energy.ri.gov">Nicholas.ucci@energy.ri.gov</a> ;	
	<a href="mailto:Christopher.Kearns@energy.ri.gov">Christopher.Kearns@energy.ri.gov</a> ;	
	<a href="mailto:Becca.Trietch@energy.ri.gov">Becca.Trietch@energy.ri.gov</a> ;	
	<a href="mailto:Nathan.Cleveland@energy.ri.gov">Nathan.Cleveland@energy.ri.gov</a> ;	
	<a href="mailto:Carrie.Gill@energy.ri.gov">Carrie.Gill@energy.ri.gov</a> ;	
	<a href="mailto:Albert.vitali@doa.ri.gov">Albert.vitali@doa.ri.gov</a>	