

**STATE OF NEW HAMPSHIRE
BEFORE THE
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION**

DE 19-197

ELECTRIC AND NATURAL GAS UTILITIES

Development of a Statewide, Multi-Use Online Energy Data Platform

DIRECT ENERGY'S PETITION TO INTERVENE

NOW COMES Direct Energy Services, LLC, Direct Energy Business, LLC and Direct Energy Business Marketing, LLC, collectively the Direct Energy Companies ("Direct Energy"), and, pursuant to RSA 541-A:32 and N.H. Admin. R. Puc 203.17, Direct Energy respectfully petitions the New Hampshire Public Utilities Commission ("Commission") for intervention as a full party in the above-captioned proceeding. In support of this petition, Direct Energy states as follows:

1. On December 13, 2019 the Commission issued an Order of Notice pursuant to RSA 378:51, II, opening a docket to develop a statewide, multi-use online energy data platform. The Order of Notice requires electric and natural gas utilities regulated by the Commission to participate in this proceeding as mandatory parties, and also states that other interested parties seeking to intervene must file Petitions to Intervene on or before January 29, 2020. This petition, therefore, is timely filed.
2. Direct Energy Services, LLC is a competitive electricity supplier registered with the Commission to serve residential and small commercial customers.
3. Direct Energy Business, LLC and Direct Energy Business Marketing, LLC are competitive electricity suppliers registered with the Commission to serve commercial and industrial customers.

4. Direct Energy Business Marketing, LLC is also registered with the Commission as a competitive natural gas supplier and currently serves small commercial and large commercial and industrial natural gas customers in the state of New Hampshire.

5. Direct Energy is one of North America's largest retail providers of electricity, natural gas and energy-related services to over three million homes and businesses. It is part of Centrica plc (LSE: CNA), a leading international energy services and solutions provider that is founded on a 200-year heritage of serving people formerly known as British Gas. Direct Energy, its subsidiaries and/or affiliates, operate in 50 U.S. states plus the District of Columbia and 8 provinces in Canada. Direct Energy is focused on satisfying the changing needs of its customers, enabling them to transition to a lower carbon future. Direct Energy's aim is to reduce emissions in line with Paris goals by 2030 and develop a path to net zero by 2050.

6. By this Petition, Direct Energy is seeking full intervention in the instant proceeding. The statutory standards for intervention, set forth in RSA 541-A:32, I and II, provide that a petition for intervention *must* be granted if the petitioner states facts demonstrating how its rights, duties, privileges, immunities or other substantial interests may be affected by the proceeding (or the petitioner qualifies under any provision of law) and the interests of justice and orderly and prompt conduct of the proceedings would not be impaired by allowing intervention. *See* RSA 541-A:32, I(b) and (c). In addition, the Commission has the authority to grant a petition to intervene "at any time, upon determining that such intervention would be in the interests of justice and would not impair the orderly conduct of the proceedings." RSA 541-A:32, II. *See also* N.H. Admin. R. Puc 203.17 (requiring the Commission to grant one or more petitions to intervene in accordance with the standards of RSA 541-A:32).

7. Direct Energy qualifies for intervention under the mandatory provisions of RSA 541-A: 32, I because its substantial interests will be affected by the proceeding. As a supplier in the highly competitive New Hampshire retail electricity and natural gas markets, Direct competes with other suppliers and the local distribution companies for a limited customer base on a variety of factors, including without limitation, pricing. Therefore, it is imperative that suppliers have access to accurate, current and quality customer usage data, subject to proper authorization, in order to effectively forecast, price and bill on behalf of its customers. Moreover, more granular customer usage data, especially coupled with the potential deployment of meters with advance metering functionality, will assist competitive retail suppliers like Direct Energy to design and offer new and innovative pricing products in the New Hampshire energy markets.

8. Direct Energy also qualifies for intervention under the discretionary standard articulated in RSA 541-A:32, II. The interests of justice and orderly conduct of the proceedings would be promoted by granting Direct Energy intervention. Given its participation in New Hampshire's competitive electricity and natural gas markets, as well as its affiliation with one of the largest competitive retail and wholesale providers of natural gas in North America, Direct Energy has extensive knowledge and expertise regarding the electricity and natural gas industries and the issues to be addressed in this docket. Moreover, whereas DE 19-197 provides for the establishment of a statewide online energy data platform, which would allow utilities, customers, and third parties like Direct Energy, to access and share data regarding customer energy usage, the Commission will benefit from Direct Energy's participation in this docket.

9. Direct Energy's intervention will not impair the orderly conduct of this proceeding. If allowed to intervene, Direct Energy will abide by the Commission's rules and the procedural schedule in this docket.

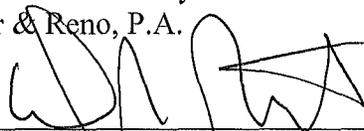
WHEREFORE, Direct Energy respectfully requests that the Commission grant it full party status as an intervenor in this proceeding and that it grant such other relief as the Commission deems just and equitable.

Respectfully submitted,

Direct Energy Services, LLC, Direct Energy
Business, LLC and Direct Energy Business
Marketing, LLC

By Their Attorneys

Orr & Reno, P.A.



Douglas L. Patch, NH Bar #1977

Orr & Reno, P.A.

45 South Main St.

Concord, NH 03302-3550

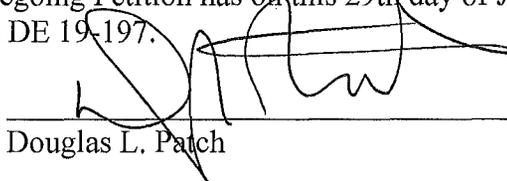
(603) 223-9161

dpatch@orr-reno.com

Dated: January 29, 2020

Certificate of Service

I hereby certify that a copy of the foregoing Petition has on this 29th day of January, 2020 been sent by email to the service list in DE 19-197.



Douglas L. Patch