



T: 617.330.7000 F: 617.439.9556
50 Rowes Wharf, Boston, MA 02110

David C. Fixler
Direct Dial: (617) 330-7099
E-Mail: dfixler@rubinrudman.com

September 20, 2010

Via Federal Express and Electronic Mail

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

RE: National Grid - 2010 Gas Cost Recovery Charge Filing - Docket No. 4199

Dear Ms. Massaro:

Pursuant to Rule 1.13 of the Practices and Procedures of the Rhode Island Public Utilities Commission, enclosed for filing please find an original and nine (9) copies of the Motion to Intervene of Direct Energy Services, LLC in the above-captioned proceeding.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'd.c. fixler'.

David C. Fixler

DCF/jmh
Enclosures

cc: Thomas R. Teehan, Senior Counsel, National Grid
Service List

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

National Grid - 2010 Gas Cost Recovery
Charge Filing

Docket No. 4199

MOTION TO INTERVENE OF DIRECT ENERGY SERVICES, LLC

Pursuant to Rule 1.13 of the Rules of Practice and Procedure of the Rhode Island Public Utilities Commission (the "Commission"), Direct Energy Services, LLC ("Direct") hereby moves to intervene as a full party in the above-captioned proceeding. In support of its Motion, Direct states the following:

1. Direct is one of North America's largest energy and energy-related service providers with more than five (5) million residential and commercial customer relationships. Direct provides customers with choice and support in managing their energy costs through a portfolio of innovative products and services. Direct operates in 21 states and 9 Canadian provinces, and reported total revenues in 2007 of \$8.6 billion. Direct is a licensed retail supplier of electricity and natural gas in Rhode Island. Direct is a subsidiary of Centrica plc, one of the world's leading integrated energy companies. Centrica has more than 32 million customer relationships and 30,000 employees worldwide, and reported total revenues in 2007 of £16.3 billion.

2. Direct Energy Services, LLC is a gas marketer authorized to provide services in Rhode Island pursuant to a license granted in Docket No. 2379(T1). Direct actively serves

commercial and industrial gas customers in Rhode Island. Direct's business address is 12 Greenway Plaza, Suite 600, Houston, TX 77046.

3. Pursuant to Rule 1.13(b), interested persons may intervene in any proceeding before the Commission if the person will be directly affected by Commission's action and if no other party could adequately represent the movant's interest in the proceeding.

4. As an active, licensed gas marketer in National Grid's service territory, Direct will be directly affected by the Commission's decision in this proceeding. Direct's existing and future business interests will be substantially affected by National Grid's calculation of its Company weighted average cost of upstream assets and the revised credits or surcharges associated with the various pipeline paths to the city gate. The credit or surcharge associated with each pipeline path is an element of a marketer's cost to serve customers in the National Grid service territory and thus Direct has an interest in, among other things, ensuring that these credits or surcharges are accurate.

5. No other existing parties to this proceeding can adequately represent the interest of Direct in its position as a competitive marketer. Indeed, Direct is not aware of any licensed gas marketer that has sought to intervene in this proceeding.

WHEREFORE, Direct Energy Services, LLC respectfully requests that its Motion to Intervene as a full party in this proceeding be granted by the Commission.

Respectfully submitted,

DIRECT ENERGY SERVICES, LLC

By its attorney,



David C. Fixler (#3839)
Rubin and Rudman LLP
50 Rowes Wharf, 3rd Floor
Boston, MA 02110
Telephone: (617) 330-7000
E-Mail: dfixler@rubinrudman.com

Dated: September 20, 2010

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused to be served electronically the foregoing document upon each person designated on the service list compiled in this proceeding.

Dated in Boston, MA this 20th day of September, 2010.



David C. Fixler