

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

IN RE: THE NARRAGANSETT ELECTRIC : DOCKET NO. 4692  
CO. d/b/a NATIONAL GRID’S 2018 :  
STANDARD OFFER SERVICE (SOS) :  
PROCUREMENT PLAN AND 2018 :  
RENEWABLE ENERGY STANDARD (RES) :  
PROCUREMENT PLAN (FILED MARCH 1, :  
2017) : AUGUST 22, 2018

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

Direct Energy Business, LLC and Direct Energy Services, LLC (collectively “Direct Energy”), by its undersigned counsel, hereby moves to intervene in this matter.

1. Direct Energy is a nonregulated power producer (“NPP”) as defined in Rhode Island General Laws (“R.I.G.L.”) § 39-1-2(19) registered with the Division of Public Utilities and Carriers (the “Division”) to offer competitive generation service in the State of Rhode Island and Providence Plantations. Direct Energy serves both residential and commercial customers in Rhode Island. In addition, Direct Energy is a wholesale supplier of electricity products in the New England markets and elsewhere.

2. By Report and Order dated March 30, 2017 and issued on May 12, 2017, the Public Utilities Commission (the “Commission”) approved the 2018 Standard Offer Service (“SOS”) Procurement Plan (the “Plan”).

3. Pursuant to the Plan, on July 18, 2018, The Narragansett Electric Co. d/b/a National Grid (“National Grid”) filed Proposed SOS Rates for the Residential Group and the Commercial Group for the Months of October 2018 through March 2019, and for the Industrial Group for the Months of October 2018 through December 2018.

4. On August 10, 2018, the Division filed a Rate Mitigation Proposal Memorandum (the “Division Memorandum”). The Division Memorandum identifies options to potentially deviate from the Procurement Plan and discusses some of the significant risks associated with those options.

5. 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. (The following may have such an interest: consumers served by the applicant...)” 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.”

6. As a company who also provides NPP retail electric generation services directly to Rhode Island consumers, Direct Energy and its customers have unique interests in this proceeding that cannot be adequately represented by another party. The recommendations put forth in the Division Memorandum, if approved by the Commission, will materially alter the pricing of the SOS rate offered by National Grid, thereby directly impacting Direct Energy’s ability to effectively compete and operate in the Rhode Island competitive electricity market.

7. Moreover, Direct Energy also operates as an active wholesale supplier of electricity products to many of New England’s electric utilities, including National Grid here in Rhode Island. Indeed, Direct Energy most recently provided National Grid wholesale SOS service from October 1, 2017 through March 31, 2018. The recommendations in the Division Memorandum, if approved by the Commission, will materially impact wholesale pricing and

other wholesale market dynamics in the future, which could, in turn, result in higher prices for consumer in the long term.

WHEREFORE, pursuant to standards articulated in Rule 1.13, Direct Energy respectfully moves for intervention as a full party in Docket No. 4556.

Respectfully Submitted,

DIRECT ENERGY BUSINESS, LLC AND  
DIRECT ENERGY SERVICES, LLC

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

Date: August 22, 2018

---

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)

Its Attorney

**CERTIFICATE OF SERVICE**

This is to certify that on the 22nd day of August, 2018, I sent a true copy of the foregoing to the attached service list.

---

Joseph A. Farside, Jr.

**Docket No. 4692 - National Grid – 2018 Standard Offer Service (SOS) and Renewable Energy Standard (RES) Procurement Plans  
Service List updated 8/14/18**

<b>Name/Address</b>	<b>E-mail Distribution</b>	<b>Phone</b>
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:margaret.janzen@nationalgrid.com">margaret.janzen@nationalgrid.com;</a>	
	<a href="mailto:Joanne.scanlon@nationalgrid.com">Joanne.scanlon@nationalgrid.com;</a>	
	<a href="mailto:James.Ruebenacker@nationalgrid.com">James.Ruebenacker@nationalgrid.com;</a>	
Adam Ramos, Esq. Hinckley Allen <a href="http://HinckleyAllen.com">Hinckley Allen</a> 100 Westminster Street, Suite 1500 Providence, RI 02903-2319	<a href="mailto:aramos@hinckleyallen.com">aramos@hinckleyallen.com;</a>	401-457-5164
Leo Wold, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	<a href="mailto:Lwold@riag.ri.gov">Lwold@riag.ri.gov;</a>	401-274-4400
	<a href="mailto:John.bell@dpuc.ri.gov">John.bell@dpuc.ri.gov;</a>	
	<a href="mailto:Al.mancini@dpuc.ri.gov">Al.mancini@dpuc.ri.gov;</a>	
	<a href="mailto:Joseph.shilling@dpuc.ri.gov">Joseph.shilling@dpuc.ri.gov;</a>	
	<a href="mailto:Jonathan.Schrag@dpuc.ri.gov">Jonathan.Schrag@dpuc.ri.gov;</a>	
	<a href="mailto:dmacrae@riag.ri.gov">dmacrae@riag.ri.gov;</a>	
	<a href="mailto:Albert.demiranda@dpuc.ri.gov">Albert.demiranda@dpuc.ri.gov;</a>	
Richard Hahn Daymark Energy Advisors One Washington Mall, 9 <sup>th</sup> floor Boston, MA 02108	<a href="mailto:rhahn@daymarkea.com">rhahn@daymarkea.com;</a>	617-778-2467
	<a href="mailto:mneal@daymarkea.com">mneal@daymarkea.com;</a>	
	<a href="mailto:mloiaco@daymarkea.com">mloiaco@daymarkea.com;</a>	
	<a href="mailto:cbencomo-jasso@daymarkea.com">cbencomo-jasso@daymarkea.com;</a>	
Michael McElroy, Esq. Schacht & McElroy PO Box 6721 Providence RI 02940-6721	<a href="mailto:Michael@McElroyLawOffice.com">Michael@McElroyLawOffice.com;</a>	401-351-4100
	<a href="mailto:leah@mcelroylawoffice.com">leah@mcelroylawoffice.com;</a>	
<b>File an original &amp; 9 copies w/:</b> Luly E. Massaro, Commission Clerk Linda George, PUC 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:Linda.George@puc.ri.gov">Linda.George@puc.ri.gov;</a>	
	<a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov;</a>	
	<a href="mailto:Todd.bianco@puc.ri.gov">Todd.bianco@puc.ri.gov;</a>	
	<a href="mailto:Cynthia.WilsonFrias@puc.ri.gov">Cynthia.WilsonFrias@puc.ri.gov;</a>	
	<a href="mailto:Sharon.ColbyCamara@puc.ri.gov">Sharon.ColbyCamara@puc.ri.gov;</a>	
<a href="mailto:Margaret.Hogan@puc.ri.gov">Margaret.Hogan@puc.ri.gov;</a>		

Office of Energy Resources 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> ;	
Douglas Gablinske, TEC-RI	<a href="mailto:Doug@tecri.org">Doug@tecri.org</a> ;	401-741-5101
Marc Hanks, Direct Energy	<a href="mailto:Marc.Hanks@directenergy.com">Marc.Hanks@directenergy.com</a> ;	413-642-3575
David Bogan Joseph Farside Kathryn Boucher, Locke Lord LLP	<a href="mailto:david.bogan@lockelord.com">david.bogan@lockelord.com</a> ; <a href="mailto:joseph.farside@lockelord.com">joseph.farside@lockelord.com</a> ; <a href="mailto:kathryn.boucher@lockelord.com">kathryn.boucher@lockelord.com</a> ;	
The George Wiley Center	<a href="mailto:camiloviveiros@gmail.com">camiloviveiros@gmail.com</a> ; <a href="mailto:debbiec@georgewileycenter.org">debbiec@georgewileycenter.org</a> ; <a href="mailto:b.flambeau@juno.com">b.flambeau@juno.com</a> ;	