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April 25, 2016

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania, Inc.
Docket No. R-2016-2529660

Dear Secretary Chiavetta:

Enclosed for electronic filing please find Direct Energy's Petition to Intervene with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,



Carl R. Shultz

CRS/lww
Enclosure

cc: Hon. Katrina L. Dunderdale w/enc.
Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of Direct Energy's Petition to Intervene upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa.

Code Section 1.54.

Via Email and/or First Class Mail

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Carl R. Shultz, Esq.

Dated: April 25, 2016

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	Docket No. R-2016-2529660
v.	:	
	:	
Columbia Gas of Pennsylvania, Inc.	:	
	:	

**DIRECT ENERGY'S
PETITION TO INTERVENE**

Pursuant to 52 Pa. Code §§ 5.72-5.75, Direct Energy Business, LLC, Direct Energy Services, LLC, and Direct Energy Business Marketing, LLC (collectively, "Direct Energy") petitions to intervene in the above-captioned matter. In support of its intervention, Direct Energy states as follows:

1. On March 18, 2016, Columbia Gas of Pennsylvania, Inc. ("Columbia" or "Company") filed Supplement No. 241 to Tariff Gas-PA. P.U.C. No. 9 to become effective May 17, 2016, containing proposed changes in rates, rules, and regulations. Proposed Supplement No. 241 to Tariff Gas-PA. P.U.C. No. 9 was suspended by operation of law until December 19, 2016, unless otherwise directed by Order of the Commission.

2. Direct Energy is an NGS licensed by the Commission at to provide natural gas and related services to retail customers in Columbia's service territory.¹ Direct Energy is a North American affiliate of Centrica plc, a leading international provider of energy and other energy-related services with over 28 million customer relationships worldwide. Direct Energy provides electricity, natural gas and other energy services to more than 5 million residential homes and businesses across North America. Direct Energy has a unique business model, and extensive

¹ See PUC Docket Nos. A-125072 (Direct Energy Business, LLC), A-125135 (Direct Energy Services, LLC) and A-2013-2365792 (Direct Energy Business Marketing, LLC).

experience in providing innovative gas and electricity products and services to residential, small and large commercial and industrial customers, utilities, and government entities. Lastly, Direct Energy, through its acquisition of Hess Energy Marketing, is the largest business gas supplier (by volume) in the eastern United States.

3. Direct Energy's attorneys in this matter are:

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4. The Commission's regulations allow intervention where a person has an interest in the proceeding which may be directly affected and which is not adequately represented by existing parties, and as to which the person may be bound by the action of the Commission in the proceeding. 52 Pa. Code § 5.72(a)(2). Intervention is also permitted where participation of the person may be in the public interest. 52 Pa. Code § 5.72(a)(3). A "person" includes a corporation and an association. 52 Pa. Code § 1.8.

5. Direct Energy meets the standards for intervention set forth in 52 Pa. Code § 5.72(a). As an NGS in the Company's service territory and in the Commonwealth, Direct Energy satisfies the standard for intervention because Direct Energy possesses an "interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding." 52 Pa. Code § 5.72(a)(1).

6. Direct Energy's interests in this proceeding are unique from and not adequately represented by other parties that may seek to intervene, including individual NGSs interested in natural gas competition in Pennsylvania in Columbia's service territory in particular. Direct Energy is licensed by the Commission to provide service to customers in Columbia's territory, and has an interest in ensuring that the Company's efforts to support sustained and robust natural gas competition, especially among residential and small commercial customers. The Company's proposed rate and tariff changes must be implemented in a competitively neutral manner to ensure that the market environment is conducive to Direct Energy's ability to offer competitive service.

7. In view of Direct Energy's unique business model, Direct Energy's interests in this proceeding cannot be adequately represented by other NGS parties with potentially different business models and different customer target markets.

8. Direct Energy will be bound by the action of the Commission in this proceeding, as well as the terms and conditions for Columbia's rates and programs. How the rates and programs are structured will have a significant effect on the level of retail competition that will be experienced in the Company's service territory during and, thus, on the ability of Direct Energy to continue to do business in Company's service territory. Thus, the Commission's actions regarding the Company's proposals will have a substantial impact on Direct Energy's future involvement in the market.

9. Direct Energy's intervention is in the public interest. As a member of the Centrica group of companies providing energy and energy related services through over 28 million customer relationships worldwide, Direct Energy has the experience and resources to aid

the Commission in establishing reasonable modifications to the tariff of Columbia. Accordingly, Direct Energy's participation in this proceeding is clearly in the public interest. *See* 52 Pa. Code § 5.72(a)(3).

10. Direct Energy has not presently identified specific issues in the proposed tariff changes. Direct Energy reserves the right to raise and address issues identified through its review and analysis of the Tariff Supplement (and related information), or other issues raised by other parties (such as any proposed modifications to the Company's tariff).

WHEREFORE, Direct Energy respectfully requests that the Commission grant Direct Energy's Petition to Intervene.

Respectfully submitted,



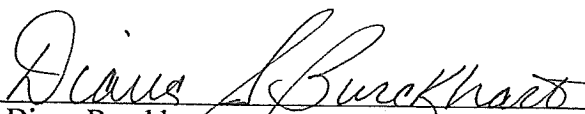
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Date: April 25, 2016

Attorneys for Direct Energy

Verification

I, Diana Burckhart, state that I am a Senior Specialist, Government and Regulatory Affairs for Direct Energy Services, LLC ("Direct Energy"). I hereby state that I am authorized to make this verification on behalf of Direct Energy, that the facts set forth in the foregoing **Petition To Intervene** are true and correct to the best of my knowledge, information and belief and that I expect Direct Energy to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to sworn falsification to authorities).



Diana Burckhart

Senior Specialist, Government and Regulatory
Affairs

Direct Energy Services, LLC