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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

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File No.: 300135-70

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December 6, 2018

Via FedEx and Email

Aida Camacho-Welch, Esq.
Secretary of the Board
New Jersey Board of Public Utilities
44 South Clinton Ave., 3rd Floor, Suite 314
P.O. Box 350
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DEC 07 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

**RE: In the Matter of the Petition of Public Service Electric & Gas Company for
Approval of Its Clean Energy Future-Energy Efficiency ("CEF-EE")
Program on a Regulated Basis
BPU Docket Nos.: GO18101112 & ~~EO10121113~~**

EO18101113

Dear Secretary Camacho-Welch:

Enclosed are an original and ten (10) copies of a Supplemental Motion to Intervene of Direct Energy Business, LLC ("Direct Business"), Direct Energy Business Marketing, LLC ("Direct Marketing"), Direct Energy Services, LLC ("Direct Services"), and Gateway Energy Services Corporation ("Gateway"), (collectively, "Direct Energy"), NRG Energy, Inc. ("NRG"), Just Energy Group, Inc. ("Just Energy") and Centrica Business Solutions (collectively the "Market Participants") in the above proceeding. By copy of this letter, copies of this Supplemental Motion are being forwarded on this date via email to all persons whose names appear on the attached Service List.

This Supplemental Motion identifies two additional entities, NRG and Just Energy, who are joining in the original request to intervene, on the same grounds as the original moving parties. There are no other substantive changes to the original Motion.

I also have enclosed an extra copy of this Supplemental Motion to be stamped "filed" and returned to this office in the enclosed self-addressed envelope.

*Case Mgmt
List Copied*

Thank you for your courtesies.

Respectfully submitted,



Christopher E. Torkelson

CET/ldr

Enclosures

cc: Stefanie A. Brand, Esq. (w/enc., via email and FedEx)
Matthew M. Weissman, Esq. (w/enc., via email and FedEx)
All Persons on Attached Service List (w/enc., via email only)

IN THE MATTER OF THE PETITION OF PUBLIC SERVICE ELECTRIC AND GAS
COMPANY FOR APPROVAL OF ITS CLEAN ENERGY FUTURE-ENERGY EFFICIENCY
("CEF-EE") PROGRAM ON A REGULATED BASIS

BPU DOCKET NOS. GO18101112 & EO10121113

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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

STATE OF NEW JERSEY
OFFICE OF ADMINISTRATIVE LAW

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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

IN THE MATTER OF THE PETITION OF
& PUBLIC SERVICE ELECTRIC AND GAS
COMPANY FOR APPROVAL OF ITS
CLEAN ENERGY FUTURE-ENERGY
EFFICIENCY ("CEF-EE") PROGRAM
ON A REGULATED BASIS

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BPU DOCKET NOS. GO18101112
~~EO10121113~~ *EO18101113*

SUPPLEMENTAL MOTION TO INTERVENE OF
DIRECT ENERGY BUSINESS, LLC,
DIRECT ENERGY BUSINESS MARKETING, LLC,
DIRECT ENERGY SERVICES, LLC, GATEWAY ENERGY SERVICES
CORPORATION, NJR RETAIL SERVICES COMPANY, NRG ENERGY, INC.,
JUST ENERGY GROUP INC. AND CENTRICA BUSINESS SOLUTIONS

Pursuant to N.J.A.C. 1:1-16.1 and 16.2, Direct Energy Business, LLC ("Direct Business"), Direct Energy Business Marketing, LLC ("Direct Marketing"), Direct Energy Services, LLC ("Direct Services"), Gateway Energy Services Corporation ("Gateway"), and NJR Retail Services Company ("NJR") (collectively, "Direct Energy"), NRG Energy, Inc. ("NRG"), Just Energy Group Inc. ("Just Energy") and Centrica Business Solutions (collectively, the "Market Participants") hereby file this Supplemental Motion to Intervene ("Supplemental Motion") in the above-captioned proceeding initiated by a Petition filed on October 11, 2018 by Public Service Electric and Gas Company ("PSE&G") for Approval of its Clean Energy Future-Energy Efficiency ("CEF-EE") Program on a Regulated Basis ("Petition").¹ In support of their Supplemental Motion, the Market Participants state as follows:

¹ The Supplemental Motion includes two additional entities requesting intervenor status – NRG and Just Energy, renames the motioning parties to the "Market Participants," and corrects a typographical error in Paragraph 6 that was identified in the Letter Response to PSE&G's Opposition to Motion to Intervene of Direct Energy and Centrica Business Solutions. It also contains new paragraphs (2, 3, 23, 24 and 25) to describe NRG and Just Energy

I. INTRODUCTION

1. Direct Energy is one of the largest competitive retail providers of electricity, natural gas and home services in North America, with over 4 million customer relationships, multiple brands and roughly 5,000 employees. As third-party energy suppliers in New Jersey, all five intervening Direct Energy companies hold electric power and/or gas supplier licenses, as follows: Direct Business – ESL-0165 (electric power) and GSL-0145 (gas supplier); Direct Marketing – ESL-0142 (electric power) and GSL-0128 (gas supplier); Direct Services – ESL-0078 (electric power) and GSL-0088 (gas supplier); Gateway – ESL-0166 (electric power) and GSL-0146 (gas supplier); and NJR – GSL-0173 (gas supplier). Direct Energy is licensed to sell natural gas and electricity to customers in PSE&G's service territory. Direct Energy and its affiliated Connected Home division offer Hive products in the direct to consumer market, as well as through partners such as retail energy providers.

2. NRG is a leading integrated power company in the U.S. A Fortune 500 company, NRG operates a reliable and efficient electric generation, a demand-side business focusing on demand response and other customer-sited energy efficiency and distributed energy investments, and a retail platform serving residential and commercial businesses. Its retail electricity providers serve almost three million customers across more than a dozen states. One million of those customers are in the Northeast markets, which include customers in New Jersey. Its demand-side businesses work with consumers on an "all-of-the-above" approach to controlling their energy costs and content. NRG's retail companies have more than 25 years combined experience with

and to provide information relevant to their participation in this proceeding. Also, Paragraph 18 contains justification for the inclusion of NRG and Just Energy at this time. Otherwise, the Supplemental Motion makes no substantive changes to the original Motion. Notably, NRG's and Just Energy's interests in this proceeding are aligned with those of Direct Energy and Centrica Business Solutions, and the Market Participants intend to jointly litigate this case. Therefore, neither the number of parties nor the issues to be addressed, relative to the original Motion filed by Direct Energy and Centrica Business Solutions, would change as a result of granting the Supplemental Motion.

retail energy competition and customer service. NRG is headquartered in Princeton, New Jersey. The company has several licensed third party suppliers that are actively serving residential, commercial, industrial and institutional customers across New Jersey.² These NRG retail companies offer customers a range of products including 100% renewable, cash back and travel rewards.

3. Just Energy Group Inc. is the parent company of licensed third party suppliers serving retail customers in New Jersey.³ Specializing in electricity, natural gas and green energy, the Just Energy corporate family serves close to two million residential and commercial customers throughout North America, the United Kingdom, Ireland and Germany, including electric and natural gas supply customers in New Jersey. Just Energy's affiliates generally offer a wide range of energy products and home energy management services such as long-term fixed-price, flat bill programs, smart thermostats and home water filtration. Just Energy and its affiliates serve residential and commercial customers throughout New Jersey.

4. Centrica Business Solutions, a subsidiary of Centrica plc and affiliate of Direct Energy, integrates localized energy solutions for businesses around the world that leverages its energy insights, onsite generation and demand management capabilities. Offering innovative distributed energy solutions, Centrica Business Solutions enables organizations to improve operational efficiency, increase resilience and drive their business vision forward.

5. By this Supplemental Motion to Intervene, the Market Participants seek party status in the above-captioned proceeding for the purpose of protecting their direct and substantial interest

² As third-party energy suppliers in New Jersey, NRG holds electric power and/or gas supplier licenses, as follows: Energy Plus Holdings LLC – ESL-0087, Independence Energy Group LLC – ESL-0100, Energy Plus Natural Gas LLC – GSL-0100, Reliant Energy Northeast LLC d/b/a NRG Home/NRG Business – ESL-0093 and GSL-0176, Green Mountain Energy Company – ESL-0098, and XOOM Energy New Jersey, LLC – ESL-0115 and GSL-0112.

³ Just Energy holds third-party supplier licenses in New Jersey as follows: Hudson Energy Services, LLC – ESL-0083 and GSL-0069 and Just Energy Solutions, Inc. – ESL-0046 and GSL-0116.

in the outcome of this proceeding. If PSE&G is granted approval by the New Jersey Board of Public Utilities (“Board” or “BPU”) to implement the new ratepayer-funded CEF-EE Program proposed by PSE&G, the interests of the Market Participants will be directly and substantially affected.

6. Specifically, as third-party suppliers, Direct Energy, NRG and Just Energy have a substantial and direct interest in a number of issues concerning PSE&G’s proposal to recover costs of a Clean Energy Future – Energy Efficiency Program. Likewise, as a market leader in distributed energy solutions, Centrica Business Solutions has a substantial and direct interest in several issues regarding PSE&G proposal to use ratepayer funds to support programs that it is offering in the private market. These issues include PSEG’s proposals which would allow it to do the following:

- Utilize its monopoly status as a public utility and rely on ratepayer funds to subsidize the deployment and installation of smart energy thermostats, appliances, lighting, and other equipment, which are already being provided through a mature private market;
- Offer customers an up-front rebate on HVAC, smart thermostats, appliances, lighting, and other equipment, using funds collected from its ratepayers, thereby placing other vendors at a competitive disadvantage;
- Replace the need for electric and natural gas infrastructure by designing a plan to achieve desired demand reductions within targeted zones without initiating a competitive process to meet demand reductions at lowest cost, and using innovative approaches designed by the market;
- Capitalize on its public utility monopoly role to promote certain vendors over other competing entities to perform professional installation services;

- Use its public utility bill to finance the products and the installation fees, which gives it an advantage over other entities promoting these products who do not have a direct billing relationship with customers, including Direct Energy, NRG and Just Energy; and
- Capture customer data that is available to the Company in its monopoly role as a public utility and use it to provide value-added services to consumers, including home energy audits, which are more appropriately offered by entities in the competitive market, including Direct Energy, NRG and Just Energy.

7. The Market Participants submit that these issues, among others, should be thoroughly examined in this proceeding.

II. BACKGROUND

8. On September 26, 2018, PSE&G initially filed this matter with the Board along with its Clean Energy Future – Electric Vehicle and Energy Storage (“CEF-EVES”)⁴ and Clean Energy Future – Energy Cloud (“CEF-EC”)⁵ Programs. At the request of the Board, PSE&G filed these three Clean Energy Future Programs separately, with their own petitions and docket numbers. On October 11, 2018, PSE&G filed its Petition with the Board pursuant to N.J.S.A. 48:2-21 and N.J.S.A. 48:2-21.1, N.J.S.A. 48:3-98.1, seeking approval for a Clean Energy Future – Energy Efficiency Program.

9. The CEF-EE Program consists of 22 subprograms, including seven residential subprograms, seven commercial and industrial (“C&I”) subprograms, and eight pilot subprograms. Petition at ¶ 14. The total proposed investment for the CEF-EF Program is approximately \$2.5 billion and with a \$283 million expense budget over the proposed 6-year term of the program.

⁴ Docket No. EO18101111

⁵ Docket No. EO18101115.

Petition at ¶ 28. PSE&G proposes to recover and track costs via a new CEF-EE Program component ("CEF-EEC") of the Company's electric and gas Green Programs Recovery Charge ("GPRC"), which would be filed annually after the proposed initial period. Petition at ¶ 32. In addition, the Company proposes a mechanism for recovering lost revenues. See Petition at ¶¶ 25-26.

10. Along with its Petition, PSE&G filed the following Direct Testimonies in support thereof: Karen Reif ("Attachment 1"); Stephen Swetz ("Attachment 2"); and Daniel Hansen ("Attachment 3").

11. The Direct Testimony of Karen Reif describes the 22 CEF-EE subprograms as follows:

- **Residential Efficient Products:** PSE&G proposes to provide rebates and on-bill repayment for HVAC, smart thermostats, appliances, lighting, and other equipment.
- **Residential Existing Homes:** PSE&G proposes to provide Rebates and on-bill repayment for energy audit, direct install of efficient equipment, and broader weatherization / appliance replacement services
- **Residential Behavioral:** PSE&G proposes to provide data analytics, home energy reports, and online energy audits.
- **Residential K-12 Education:** PSE&G proposes to provide curriculum to teach energy efficiency and a take-home kit with efficient products.
- **Residential New Construction:** PSE&G proposes to provide rebates to builders and owners for new construction meeting energy efficiency standards.

- **Residential Multi-Family:** PSE&G proposes to provide energy audit and direct install of efficient equipment at no charge to tenants.
- **Residential Income Eligible:** PSE&G proposes to provide energy audit, direct install of efficient equipment, and broader weatherization/appliance replacement services at no charge.
- **C&I Perspective:** PSE&G proposes to provide rebates and on-bill repayment for HVAC, lighting, motors & drives, refrigeration, water heaters, air compressors, and food service equipment.
- **C&I Custom:** PSE&G proposes to provide custom incentives for large energy efficiency projects, including on-bill repayment.
- **C&I Small Non-Residential Efficiency:** PSEG proposes to provide rebates and on-bill repayment for direct-installed EE measures to small non-residential customers of lighting, controls, refrigeration, heating and air conditioning upgrades, etc.
- **C&I New Construction:** PSE&G proposes to provide rebates to builders and owners for new construction meeting energy efficiency standards.
- **C&I Energy Management:** PSE&G proposes to provide retro-commissioning and strategic energy management: optimizing existing systems with little to no equipment upgrades.
- **C&I Engineered Solutions:** PSE&G proposes to provide whole-building engineered energy saving solutions to hospitals, school districts, universities, municipalities, apartment buildings and other non-profit public entities.

- **C&I Streetlight:** PSE&G proposes to provide replacement of HPS and LED luminaires and smart cities pilot.
- **Emerging Technologies & Approaches:** PSE&G proposes to provide funding and support to identify, demonstrate, and deploy the next generation of energy efficiency technologies.
- **Energy Efficiency as a Service Pilot:** PSE&G proposes to provide monthly service contracts, incentives, and extensive guidance on energy efficient building equipment and software.
- **Smart Homes Pilot:** PSE&G proposes to provide automated and personalized savings measures using an ecosystem of energy efficient devices and technologies working in coordination.
- **Non-Wires Alternative Pilot:** PSE&G proposes to defer or replace the need for electric infrastructure upgrades through the extensive deployment of energy efficiency and demand response resources.
- **Non-Pipes Solution Pilot:** PSE&G proposes to defer or replace the need for gas infrastructure upgrades through the extensive deployment of energy efficiency and demand response resources.
- **Volt Var Pilot:** PSE&G proposes to use smart-grid technology to automate control of the electric power distribution grid to reduce energy consumption, peak demand, system losses and enable more solar.
- **Business Energy Reports Pilot:** PSE&G proposes to use data analytics, home energy reports and online energy audits for businesses.

- **Building Operator Certification Pilot:** PSE&G proposes to provide a training program for building operations staff responsible for energy-using equipment.

Attachment 1 at 6-9.

12. The Direct Testimony of Stephen Swetz describes the revenue requirement methodologies, cost recovery mechanisms, and provides a bill impact analysis for the EEF-EE Program.

13. The Direct Testimony of Daniel Hansen focuses on PSE&G's Green Enabling Mechanism ("GEM") proposal, which Mr. Hansen said is intended to remove the disincentive to promote conservation and energy efficiency that PSE&G faces because of its retail distribution rate designs. Attachment 3 at 1-2.

14. By Order adopted on October 29, 2018, the Board determined that the Petition should be retained by the Board for hearing and designated Commissioner Dianne Solomon as the presiding officer. The Board further established November 16, 2018 as the date by which entities seeking to intervene or participate must file the appropriate application.⁶ The Order went into effect November 8, 2018.

III. APPLICABLE LEGAL STANDARDS

15. Under N.J.A.C. 1:1-16.1, any person or entity who will be substantially and directly affected by the outcome of a contested case, may on motion, seek leave to intervene.

16. In ruling on a motion to intervene, the presiding officer "shall take into consideration the nature and extent of the movant's interest in the outcome of the case, whether or not the movant's interest is sufficiently different from that of any party so as to add measurably and constructively to the scope of the case, the prospect of confusion or undue delay arising from

⁶ The Motion to Intervene of Direct Energy and Centrica Business Solutions was filed on November 16, 2018.

the movant's inclusion, and other appropriate matters." N.J.A.C. 1:1-16.3. *See, e.g., In the Matter of the Petition of Public Service Electric and Gas Company Offering an Energy Stimulus Program*, Docket No. EO09010058 (Order Granting Intervention and Admission Pro Hac Vice dated March 27, 2009).

IV. ARGUMENT

17. This Supplemental Motion to Intervene should be granted because the interests of the Market Participants will be substantially and directed affected by the outcome of this proceeding and these interests are sufficiently different from those of any party so as to add measurably and constructively to the scope of the case.

18. This Supplemental Motion is timely and will not delay or otherwise disrupt the adjudication of this proceeding. The Market Participants submit that the addition of NRG and Just Energy is not untimely, as they are seeking to join in the Intervention timely filed by Direct Energy and Centrica Business Solutions on November 16, 2018.⁷ Nevertheless, late filed Motions to Intervene are traditionally granted if the intervenor's interest is sufficiently different so as to add measurably and constructively to the scope of the case and if the late-filed intervention will not cause confusion or undue delay. *See* N.J.A.C. 1:1-16.3. Even if the Supplemental Motion to Intervene of NRG and Just Energy is determined to be untimely, their intervention should, nonetheless, be granted, since the Supplemental Motion: (i) raises no new or different issues; (ii) does not expand the number of parties; (iii) does not require any changes to the procedural schedule; (iv) does not change any arguments raised by PSE&G in its Opposition Letter or the Letter in Response filed by Direct Energy and Centrica Business Solutions; and (v) would allow

⁷ Also, the Market Participants note that a motion for leave to intervene may be filed any time after a case is initiated. N.J.A.C. 1:1-16.2.

the Board to hear, through the single voice the Market Participants, the perspectives of additional companies in the energy market with unique business models, product and service offerings and experiences. *See In the Matter of the Verified Petition of Jersey Central Power & Light Company and Mid-Atlantic Interstate Transmission, LLC, et al.*, Docket No. EM15060733, et al. (Order dated August 15, 2016) (late intervention granted based on representation that party would take the record “as is” and the party’s expertise would contribute to the development of a full and complete record).

19. Fundamental fairness and due process considerations require that the Market Participants be afforded an opportunity to fully participate as an intervenor in this proceeding, due to their substantial and direct interests in the outcome of this proceeding and the proposals of PSE&G to use its monopoly status and ratepayer funds to gain a competitive advantage over other market participants.

20. While PSE&G has described itself as being uniquely positioned to offer the products and services proposed, a mature private market is already available for consumers to purchase these products and services.

21. Direct Energy and its affiliated Connected Home division offer Hive products in the direct to consumer market, as well as through partners such as retail energy providers, which include Hive Active Thermostat™, Hive Active Light™ bulbs, Hive Active Plug™ and Hive Window and Door Sensor. With Hive, consumers can control their heating and cooling, lights, plugs and sensors through a mobile application.

22. In addition, Direct Energy has a family of brands, including: (i) Mister Sparky, which designs, installs, services and repairs electrical systems and parts; (ii) Airtron, which offers HVAC solutions including new installations; and (iii) One-Hour Heating and Air Conditioning,

which offers installation, repair, and maintenance for heating, ventilation and air conditioning systems. Direct Energy also offers home energy audits, using customer data to perform analytics and offer recommendations on how customers can reduce their overall energy consumption.

23. NRG's Business Solutions affiliates provide end use customers with a variety of services aimed at reducing costs, improving reliability, increasing access to renewable resources, managing overall customer energy needs by reducing capacity obligations, improving generation operations, and offering mobile charging options. NRG's technology based solutions include asset-backed demand response, efficiency assessments, backup generation, mobile NRG Go Stations and Street Charge®. For customers who like the idea of renewables but need a guiding hand, NRG's Renewables team finds solutions that overcome real-world constraints in cost-effective, low investment ways. Customers who need to monitor their energy usage – and spending – can employ NRG's demand side management program to manage rising capacity costs using short term strategies that foster long term savings. Customers can take advantage of real-time interval metering with access to an energy usage dashboard, behind the meter generator installations, as well as retrofitting existing generators for environmental compliance in order to participate in demand response programs.

24. On the residential side, NRG and its retail affiliates offer energy usage tools and energy savings products directly to consumers which include: electricity plans with Nest Thermostats and Google Home devices that include Google Assistant – enabling customers to monitor their energy usage and manage their Reliant⁸ accounts. NRG's retail companies also provide home energy audits and offer account usage applications that allow customers to track their usage and see estimates of final bills, text-on-demand usage alerts, and weekly summary

⁸ Reliant is an NRG retail affiliate serving customers in Texas.

emails. NRG also provides AC and Heating Services and Repair, backup generation, and air filter services to reduce energy consumption. NRG tests the latest technologies for residential applications in its Smart House located in Houston Texas.

25. Just Energy has invested substantially in developing partnerships with Retailers in New Jersey, including Sam's Clubs, Sears and Kmart, among others, and is actively engaged in negotiations to expand that channel. The proposed Residential Efficient Products Subprogram explicitly seeks to work with the same Retailers that Just Energy and other Third Party Suppliers are partnering with, in direct competition to the competitive marketplace. Just Energy's Perks Loyalty Rewards program provides customers with the ability to redeem Perks Points for an array of Energy Efficient products for their homes. Many New Jersey residents have benefitted from this program, which would be substantially undermined by PSE&G's proposal. Just Energy Advanced Solutions provides Commercial and Industrial customers with an array of energy saving services including energy audits, LED retrofits, cloud-based HVAC monitoring and control solutions and other customized solutions to reduce their consumption.

26. Centrica Business Solutions integrates localized energy solutions for businesses around the world that leverages its energy insights, onsite generation and demand management capabilities. The energy solutions integrated by Centrica Business Solutions include solar, combined heat and power, energy efficiency, energy insight, demand response, power generation and energy storage. Centrica Business Solutions provides end-to-end energy services across design, manufacture, financing, installation and maintenance. Offering innovative distributed energy solutions, Centrica Business Solutions enables organizations to improve operational efficiency, increase resilience and drive their business vision forward.

27. If the BPU approves the sub-programs proposed by PSE&G, along with the cost recovery which is sought from ratepayers, PSE&G would be utilizing its monopoly status as a regulated public utility to directly compete with services that are available through the private market, which would adversely affect the Market Participants.

28. Similarly, BPU approval of PSE&G's proposal to offer customers an up-front rebate on HVAC, smart thermostats, appliances, lighting, and other equipment, which would be funded through ratepayer dollars, would place other vendors, including the Market Participants, at a competitive disadvantage.

29. Further, endorsement by BPU of PSE&G's proposal to design a plan to achieve desired demand reductions within targeted zones may place suppliers, including the Market Participants, at a competitive disadvantage if PSE&G is not required to select suppliers through a competitive process to meet demand reductions and to use technology designed by the market.

30. In addition, approving PSE&G's proposal to use its status as a public utility to promote certain installation services would provide those vendors with a competitive advantage over other entities, including the Market Participants.

31. Moreover, allowing PSE&G to use its public utility bill to finance the products and the installation fees would place Direct Energy, NRG and Just Energy at a competitive disadvantage since they do not have a direct billing relationship with customers.

32. Finally, permitting PSE&G to capture customer data that is available to the Company in its public utility role and use it to provide value-added services to consumers, including home energy audits, would adversely affect other market participants, including Direct Energy, NRG and Just Energy, particularly when such services are more appropriately offered by the market. The Market Participants have a concern about the potential ability of PSE&G to share

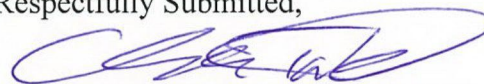
this data with preferred vendors to the exclusion of other market participants, without any authorization or other privacy and security protocols in place.

33. For these reasons, it is critical that the Market Participants be granted intervention so that they can adequately guard against being placed at a competitive disadvantage relative to the regulated public utility in the provision of products and services to customers that are already flourishing in the private market. Given the Market Participants' active participation in offering these products and services, their interest is sufficiently different from that of any party so as to add measurably and constructively to the scope of the case.

III. CONCLUSION

On the basis of the foregoing, Direct Energy Business, LLC, Direct Energy Business Marketing, LLC, Direct Energy Services, LLC, Gateway Energy Services Corporation, NJR Retail Services Company, NRG Energy, Inc., Just Energy Group Inc. and Centrica Business Solutions respectfully request that the Office of Administrative Law grant this Supplemental Motion to Intervene so that the Market Participants may have full party status as an intervenor in this proceeding. The Market Participants have interests in this proceeding that will be substantially and directed affected by the outcome of this proceeding, their interests are sufficiently different from that of any party so as to add measurably and constructively to the scope of the case, and this Motion is timely and will not delay or otherwise disrupt the adjudication of this proceeding.

Respectfully Submitted,



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Attorneys for Direct Energy, NRG Energy, Inc.,
Just Energy Group Inc., and Centrica Business
Solutions ("Market Participants")

Dated: December 6, 2018

CERTIFICATION OF FILING AND SERVICE

The undersigned hereby certifies that on the date set forth below an original and ten copies of the Supplemental Motion to Intervene was sent for filing via FedEx to the State of New Jersey, Board of Public Utilities as follows:

Aida Camacho-Welch
Secretary of the Board
Board of Public Utilities
44 South Clinton Avenue, 3rd Floor, Suite 314
P. O. Box 350
Trenton, New Jersey 08625-0350

and that two copies of each of the aforementioned documents were served via email and FedEx upon counsel of record as follows:

Stefanie A. Brand, Esq.
The Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, New Jersey 08625

Matthew M. Weissman, Esq.
Gen. Regulatory Counsel – Rates
PSEG Service Co.
80 Park Plaza T5
Newark, New Jersey 07102

and that copies of each of the aforementioned documents were served via electronic mail to the parties identified on the attached service list.



Christopher E. Torkelson

Dated: December 6, 2018