

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The East)	
Ohio Gas Company d/b/a Dominion Energy)	Case No. 22-0179-GA-ATA
Ohio for Approval of Tariff Revisions)	

In the Matter of the Application of The East)	
Ohio Gas Company d/b/a Dominion Energy)	Case No. 22-0180-GA-UNC
Ohio for Approval of Carbon Offset Program)	

**JOINT MOTION TO INTERVENE
OF
DIRECT ENERGY BUSINESS LLC
DIRECT ENERGY SERVICES LLC
DIRECT ENERGY BUSINESS MARKETING LLC
ENERGY PLUS NATURAL GAS LLC
RELIANT ENERGY NORTHEAST LLC
STREAM OHIO GAS & ELECTRIC, LLC
AND
XOOM ENERGY OHIO, LLC**

Pursuant to Ohio Revised Code Section 4903.221 and Ohio Administrative Code 4901-1-11, Direct Energy Business LLC; Direct Energy Services LLC; Direct Energy Business Marketing LLC; Energy Plus Natural Gas LLC; Reliant Energy Northeast LLC; Stream Ohio Gas & Electric, LLC; and XOOM Energy Ohio, LLC (collectively, the “NRG Retail Companies”) jointly move to intervene in these proceedings as full parties of record. The East Ohio Gas Company d/b/a Dominion Energy Ohio’s (“DEO”) application directly affects the NRG Retail Companies’ business interests and the NRG Retail Companies seek to intervene in order to protect those interests. The NRG Retail Companies’ joint motion is timely and their participation will not unduly delay this proceeding. Also, the NRG Retail Companies can contribute significantly to this proceeding, and no existing parties represent the NRG Retail Companies’ interests. The reasons supporting the NRG Retail Companies’ intervention are further detailed in the accompanying memorandum in support. The

NRG Retail Companies respectfully request that the Public Utilities Commission of Ohio grant their joint motion as presented.

Respectfully Submitted,

/s/ Gretchen L. Petrucci

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**MEMORANDUM IN SUPPORT OF
THE JOINT MOTION TO INTERVENE
OF
DIRECT ENERGY BUSINESS LLC
DIRECT ENERGY SERVICES LLC
DIRECT ENERGY BUSINESS MARKETING LLC
ENERGY PLUS NATURAL GAS LLC
RELIANT ENERGY NORTHEAST LLC
STREAM OHIO GAS & ELECTRIC, LLC
AND
XOOM ENERGY OHIO, LLC**

Direct Energy Business LLC; Direct Energy Services LLC; Direct Energy Business Marketing LLC; Energy Plus Natural Gas LLC; Reliant Energy Northeast LLC; Stream Ohio Gas & Electric, LLC; and XOOM Energy Ohio, LLC (collectively, the “NRG Retail Companies”) move to intervene in these proceedings as full parties of record.

Ohio Revised Code Section (“R.C.”) 4903.221 and Ohio Administrative Code (“Rule”) 4901-1-11 establish the standard for intervention in the above-styled proceeding as a full party of record. Rule 4901-1-11 states in part:

(A) Upon timely motion, any person shall be permitted to intervene in a proceeding upon a showing that:

* * *

(2) The person has a real and substantial interest in the proceeding, and the person is so situated that the disposition of the proceeding may, as a practical matter, impair or impede his or her ability to protect that interest, unless the person’s interest is adequately represented by existing parties.

In addition to establishment of a direct interest, the Public Utilities Commission of Ohio (the “Commission”) also considers the nature of the intervenor’s interest, the extent that interest is represented by existing parties, the intervenor’s potential contribution to a just and expeditious resolution of the issues involved, and whether intervention would result in an undue delay of the proceeding. *See also* R.C. 4903.221(B) upon which the above rule is authorized. A

review of these factors in light of the following facts supports granting the requested intervention.

The East Ohio Gas Company d/b/a Dominion Energy Ohio (“DEO”) proposes a new program under which competitive retail natural gas suppliers would offer carbon-offsetting commodity rates to customers in DEO’s service territory and DEO would facilitate/administer the program through education, supplier participation, and validating the carbon offsets. Application at 6. The NRG Retail Companies are either active suppliers in DEO’s service territory today or suppliers who may be active in the territory in the future, and therefore they have an interest in this proposed new program.

The NRG Retail Companies are knowledgeable and experienced suppliers in Ohio and in other jurisdictions. Additionally, the NRG Retail Companies offer carbon-offset natural gas products in other jurisdictions. Therefore, the NRG Retail Companies will contribute significantly to a just and expeditious resolution of the issues involved in this proceeding. The NRG Retail Companies will not unduly delay the proceeding – and are filing this motion to intervene timely (no deadline for intervention has been set). Additionally, the NRG Retail Companies’ interests are not adequately represented by any of the existing parties – neither DEO nor the Staff represents their interests – and the NRG Retail Companies’ interests are not represented by the other entities with a pending motion to intervene.

The NRG Retail Companies satisfy the requirements for intervention, and the NRG Retail Companies request that the Commission grant this joint motion to intervene and make the NRG Retail Companies full parties of record. The NRG Retail Companies' motion should be granted.

Respectfully Submitted,

/s/ Gretchen L. Petrucci

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CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served (via electronic mail) on the 25th day of March 2022 upon all persons/entities listed below:

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Case No(s). 22-0179-GA-ATA, 22-0180-GA-UNC

Summary: Motion Joint Motion to Intervene electronically filed by Mrs. Gretchen L. Petrucci on behalf of Direct Energy Business LLC and Direct Energy Services LLC and Direct Energy Business Marketing LLC and Energy Plus Natural Gas LLC and Reliant Energy Northeast LLC and Stream Ohio Gas & Electric, LLC and XOOM Energy Ohio, LLC