

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF DELAWARE**

IN THE MATTER OF THE PETITION OF *
DIRECT ENERGY SERVICES, LLC TO *
REQUEST THE PUBLIC SERVICE *
COMMISSION TO ISSUE, ON AN *
EXPEDITED BASIS, AN ORDER DIRECTING * PSC DOCKET NO. 16-0744
DELMARVA POWER & LIGHT COMPANY *
TO DISTRIBUTE AN EDUCATIONAL BILL *
INSERT REGARDING THE OPTIONS *
AVAILABLE UNDER THE CONTRACT *
AWARDED BY THE STATE OF DELAWARE *
(FILED JUNE 30, 2016) *

* * * * *

**PETITION TO INTERVENE OF
THE RETAIL ENERGY SUPPLY ASSOCIATION**

Petitioner, Retail Energy Supply Association (“RESA”),¹ by counsel, petitions the Commission to intervene in the above-captioned proceeding and, and as grounds therefore, states as follows:

1. RESA is a non-profit trade association of independent corporations that are involved in the competitive supply of electricity and natural gas. RESA and its members are actively involved in the development of retail and wholesale competition in electricity and natural gas markets in various states throughout the region, including Maryland, Pennsylvania, New Jersey, New York, Delaware, and the District of Columbia.

¹ The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of more than twenty retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

2. On June 30, 2016, Direct Energy Services, LLC (“Direct Energy”) filed a Petition with the Delaware Public Service Commission (“Commission”) requesting, on an expedited basis, that the Commission direct Delmarva Power & Light Company (“Delmarva”) to distribute a bill insert to Delmarva’s customers with certain information about Direct Energy’s offerings under a contract awarded by the Delaware Department of State to Direct Energy.

3. On July 26, 2016, in Order No. 8922, the Commission established this proceeding soliciting written comments and interventions from interested persons for the consideration of Direct Energy’s petition.

4. RESA and its members are interested in and concerned about the bill insert described in Direct Energy’s petition, which will directly impact Delaware’s evolving competitive retail electricity market.

5. RESA’s collective experience in the development of competitive energy markets, and the collective experience and knowledge of its member companies, enable it to bring a unique perspective on retail competition-related communications between distribution utilities, such as Delmarva, and their distribution customers.

6. All correspondence to RESA should be addressed to RESA’s counsel at the following addresses:

Ronald S. Gellert
Brya M. Keilson
Gellert Scali Busenkell & Brown, LLC
1201 North Orange Street, Suite 300
Wilmington, Delaware 19801
Tel: (302) 425-5800
rgellert@gsbblaw.com

-and-

Brian R. Greene
GREENEHURLOCKER, PLC
1807 Libbie Avenue, Suite 102
Richmond, Virginia 23226
Tel: 804.672.4542 (direct)
bgreene@greenehurlocker.com

7. Any decision by this Commission with respect to Direct Energy's petition could affect RESA's interests and the interests of RESA's members. RESA's interests are not now, nor will they be, adequately represented by any other party.

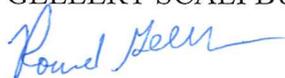
WHEREFORE, RESA requests that this Commission allow it to intervene in this proceeding as a party, with all rights attendant thereto.

Respectfully submitted,

RETAIL ENERGY SUPPLY ASSOCIATION

By Counsel

GELLERT SCALI BUSENKELL & BROWN, LLC



Dated: August 31, 2016

Ronald S. Gellert (No. 4259)
Brya M. Keilson (No. 4643)
1201 North Orange Street, Suite 300
Wilmington, Delaware 19801
Tel: (302) 425-5800
rgellert@gsbblaw.com

-and-

Brian R. Greene
GREENEHURLOCKER, PLC
1807 Libbie Avenue, Suite 102
Richmond, Virginia 23226
Tel: (804) 672-4542
bgreene@greenehurlocker.com
(Motion for Admission *Pro Hac Vice* pending)

Counsel for the Retail Energy Supply Association

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Petition to Intervene was sent via email and first class mail, postage pre-paid, on August 30, 2016, to all those identified on the service list attached for Docket No. 16-0744.

/s/ Ronald S. Gellert

Ronald S. Gellert (DE Bar Id# 4259)

Service list for 16-0744

<p>Brenda Mayrack Connie McDowell Delaware Public Service Commission 861 Silver Lake Blvd. Cannon Building, Suite 100 Dover, DE 19901</p>	<p>Matthew Hartigan Robert Howatt Delaware Public Service Commission 861 Silver Lake Blvd. Cannon Building, Suite 100 Dover, DE 19901</p>
<p>Tara Lattomus Direct Energy Services 222 Delaware Avenue Wilmington, DE 19801</p>	<p>Todd Goodman Delmarva Power P.O. Box 6066 Newark DE 19714</p>
<p>Jo Donoghue Delaware Public Service Commission 820 North French Street, 6th Floor Wilmington, DE 19801</p>	<p>Pamela Scott Delamarva Power 500 North Wakefield Driver Newark, DE 19702</p>
<p>David Bonar Andrea Maucher Division of the Public Advocate 29 South State Street Dover, DE 19901</p>	<p>Regina Lorii Ruth Ann Price Division of the Public Advocate 820 N. French Street, 4th Floor Wilmington, DE 19801</p>