



**NRG Energy Inc.**  
Regulatory Compliance  
910 Louisiana Street, Suite B200  
Houston, TX 77002

October 27, 2021

New Hampshire Public Utilities Commission  
Attn: Dianne Martin, Chairwoman  
21 South Fruit Street, Suite 10  
Concord, NH 03301-2428

**Re: Electric Supplier License Renewal Applications, Direct Energy Business Marketing, LLC  
DM 13-260 Supplemental Filing**

Dear Ms. Martin,

Enclosed please find, Direct Energy Business Marketing, LLC's ("DEBM") updated application. We have updated page 4, Puc 2006.(01)(l) and Puc 2006.(01)(m) information indicating that DEBM, LLC does not intend to provide electric service in the Eversource Energy, Liberty Utilities, NH Electric Cooperative, Inc. and Unitil Energy Systems, Inc. service areas at this time.

Also included are two copies of this report in compliance with New Hampshire Code of Administrative Rules, Puc 2000, Puc 2003.02. I have also emailed a PDF version to [registrations@energy.nh.gov](mailto:registrations@energy.nh.gov), [Executive.Director@puc.nh.gov](mailto:Executive.Director@puc.nh.gov), [clerksoffice@puc.nh.gov](mailto:clerksoffice@puc.nh.gov) and [Gary.M.Cronin@energy.nh.gov](mailto:Gary.M.Cronin@energy.nh.gov).

Should you have any questions or require additional information, please contact me at 281-800-6126 or via email at [joyce.jones@nrg.com](mailto:joyce.jones@nrg.com).

Respectfully Submitted,

A handwritten signature in black ink that reads "Joyce Jones". The signature is written in a cursive, flowing style.

Joyce W. Jones  
*Compliance Specialist*

enclosures



### Competitive Electric Power Supplier Application Form

This form may be used to: (1) apply for initial registration as a competitive electric power supplier (CEPS) in New Hampshire, (2) apply for renewal of registration as a CEPS in New Hampshire, and (3) notify the Commission of any changes to information in a previously filed CEPS application. *This form is provided as a convenience for filing only; you are required to provide all information specified under Puc 2006.01 when applying for initial or renewal registration as a CEPS, but you are not required to use this form when doing so.*

| Indicate whether this application is for an initial registration or for a renewal. Initial <input type="checkbox"/> Renewal <input checked="" type="checkbox"/> |  |  |
|---|--|--|
| Applicant's General Information   |  |  |
| Puc 2006.01(a)  | Legal Name   | Direct Energy Business, Marketing, LLC |
|   | Trade Name (d/b/a) (if applicable)   | Direct Energy Business                 |
| Puc 2006.01(b)  | Business Mailing Address   | 194 Wood Avenue South, Suite 200       |
|   |  | Iselin, NJ 08830                       |
|   | Telephone Number   | 732 -516 -7500                         |
|   | E-Mail Address   | business.directenergy.com              |
|   | Website Address  | www.business.directenergy.com          |
| Puc 2006.01(c)  | Provide the state or jurisdiction of organization, if anything other than an individual.   | DELAWARE                               |
| Puc 2006.01(d)  | Provide the name(s), title(s), business address(es), telephone number(s), and e-mail address(es) of the applicant if an individual, or of the applicant's principal(s) <sup>1</sup> if it is anything other than an individual. Use additional sheets as needed. |  |
|   | Name   | Please see Attachment A                |
|   | Title  |  |
|   | Business Mailing Address   |  |
|   |  |  |
|   | Telephone Number   | - -                                    |
|   | E-Mail Address   |  |
|   | <hr/>  |  |
|   | Name   |  |
|   | Title  |  |
|   | Business Mailing Address   |  |
|   |  |  |
|   | Telephone Number   | - -                                    |
|   | Email Address  |  |
|   | <hr/>  |  |
|   | Name   |  |
|   | Title  |  |
|   | Business Mailing Address   |  |
|   |  |  |
|   | Telephone Number   | - -                                    |
| E-Mail Address  |  |  |

<sup>1</sup> "Principals" means, for a corporation, any of its officers, directors, or controlling shareholders, for a limited liability company, any of its managers or controlling members, for a partnership, any of its general partners, and for any other business entity, any of its personnel exercising executive functions and any of its controlling equity owners.



| <b>Affiliates and Subsidiaries</b>   |   |                                  |
|--|---|----------------------------------|
| Puc<br>2006.01(e)  | Provide the following information regarding any affiliates <sup>2</sup> and subsidiaries of the applicant that are conducting business in New Hampshire. Use additional sheets as needed. |                                  |
|  |   |                                  |
|  | Name of Entity  | DIRECT ENERGY BUSINESS, LLC      |
|  | Business Address  | 1001 Liberty Ave, Suite 1200     |
|  |   | Pittsburgh, PA 15222             |
|  | Telephone Number  | 800-437-7265                     |
|  | Provide a description of the business purpose of the entity.<br>RETAIL ENERGY SERVICE PROVIDER  |                                  |
|  | Provide a description of any agreements with any affiliated New Hampshire utility, and the docket number relative to the filing of any such agreements with the Commission.<br>n/a        |                                  |
|  |   |                                  |
|  | Name of Entity  | DIRECT ENERGY SERVICES, LLC      |
|  | Business Address  | 910 Louisiana Street, Suite B200 |
|  |   | Houston, TX 77002                |
|  | Telephone Number  | 888-305-3828                     |
|  | Provide a description of the business purpose of the entity.<br>RETAIL ENERGY SERVICE PROVIDER  |                                  |
| Provide a description of any agreements with any affiliated New Hampshire utility, and the docket number relative to the filing of any such agreements with the Commission.<br>n/a |   |                                  |

<sup>2</sup> "Affiliate" means any of the following:

- (a) Any person or entity that directly or indirectly owns, controls, or holds with power to vote a majority of the outstanding voting securities or such minority thereof as to give such person substantial control of another person or entity;
- (b) Any person or entity that is directly or indirectly owned, controlled, or held by any person or entity described in (a) above through either power to vote a majority of the outstanding voting securities or such a minority so as to maintain substantial control of such person or entity;
- (c) Any person or entity with which another person or entity has a management or service contract or arrangement that provides such person or entity with effective control over the management, supervision, or operation of the other person or entity; or
- (d) Any person or entity who or which actually exercises effective control over the management, supervision, or operation of another person or entity.



| Customer Service Department Contact |   |                               |
|-------------------------------------|---|-------------------------------|
| Puc 2006.01(f)                      | Name                                      | Marissa Park                  |
|                                     | Title                                     | Supervisor, Customer Service  |
|                                     | Toll-Free Telephone Number (if available) | 888-925-9115                  |
|                                     | Telephone Number                          | 412-819-2705                  |
|                                     | E-Mail Address                            | Marissa.Park@directenergy.com |

| Customer Complaints Contact |                                |                                  |
|-----------------------------|--------------------------------|----------------------------------|
| Puc 2006.01(g)(1)           | Name                           | Nicole Nadeja                    |
|                             | Title                          | Supervisor, Customer Escalations |
|                             | Business Mailing Address       | 1001 Liberty Ave, Suite 1200     |
|                             |                                | Pittsburgh, PA 15222             |
|                             | Telephone Number               | 412-819-2750                     |
| E-Mail Address              | Nicole.Nadeja@directenergy.com |                                  |

| Regulatory Compliance Matters Contact |                             |                                 |
|---------------------------------------|-----------------------------|---------------------------------|
| Puc 2006.01(g)(2)                     | Name                        | Marc Hanks                      |
|                                       | Title                       | Sr. Manager, Regulatory Affairs |
|                                       | Business Mailing Address    | 24 Gary Dr.                     |
|                                       |                             | Westfield, MA 01085             |
|                                       | Telephone Number            | 413-642-3575                    |
| E-Mail Address                        | Marc.Hanks@directenergy.com |                                 |

| Commission Assessment Payments Contact |                          |  |
|--|--------------------------|--|
| Puc 2006.01(g)(3)                      | Name                     | Joyce W. Jones   |
|  | Title                    | Compliance Specialist  |
|  | Business Mailing Address | 910 Louisiana Street, Suite B200;<br>Attn: Regulatory Compliance |
|  |                          | Houston, TX 77002  |
|  | Telephone Number         | 281-800-6126   |
| E-Mail Address                         | joyce.jones@nrg.com      |  |



| <b>Separate Attachments: Business Authority, Trade Name, ISO-NE Market Participation, and EDI Certification</b> |   |
|---|---|
| Puc 2006.01(h)  | Provide, as a separate attachment, evidence of the applicant's authorization to do business in New Hampshire from the New Hampshire secretary of state by submitting, with this application form, either of the following:<br><br>(1) a recent printout of the applicant's listing on the N.H. Secretary of State website with the status "In Good Standing" or words of similar import; or Please see Attachment B<br><br>(2) a copy of a certificate from the N.H. Secretary of State's office stating that the applicant is authorized to do business in New Hampshire. Please see Attachment B  |
| Puc 2006.01(i)  | Provide, as a separate attachment, evidence of the applicant's registration of the trade name, if any, to be used by the applicant in New Hampshire from the New Hampshire secretary of state by submitting, with this application form, either of the following:<br>(1) A recent printout of the applicant's trade name on the N.H. Secretary of State website with the status "Active" and indicating that the trade name is owned by the applicant; or Please see Attachment C<br>(2) A copy of a certificate from the N.H. Secretary of State's office indicating that the applicant has registered as doing business under the trade name. Please see Attachment C |
| Puc 2006.01(j)  | Provide, as a separate attachment, evidence of the applicant's ISO New England market participant membership.<br><b>Please see Attachment D</b>   |
| Puc 2006.01(k)  | Provide, as a separate attachment, electronic data interchange (EDI) certification from each electric distribution utility in whose franchise area the applicant intends to operate. <b>Please see Attachment E</b>   |

| <b>Franchise Areas, Customer Types to be Served, and Other States</b> |   |
|---|---|
| Puc 2006.01(l)  | List the utility franchise areas in which the applicant intends to operate and, to the extent the applicant does not intend to provide service in the entire franchise area of a utility, a delineation of the cities and towns where the applicant intends to provide service within each utility franchise area.<br><b>Direct Energy Business Marketing, LLC does not intend to provide electric supply service in the Eversource Energy, Liberty Utilities, NH Electric Cooperative Inc. and Unitil Energy Systems, Inc. service areas at this time. If this changes in the future, we will notify NH PUC.</b> |
| Puc 2006.01(m)  | Provide a statement whether or not the applicant intends to serve the following types of customers: residential, small commercial, large commercial, and industrial.<br><b>Direct Energy Business Marketing, LLC does not intend to serve large commercial and industrial customers at this time and will not serve residential and small commercial customers. If this changes in the future, we will notify NH PUC.</b>   |
| Puc 2006.01(n)  | List the other states or jurisdictions in which the applicant currently conducts business relating to the sale of electricity.<br><br><b>Please see Attachment F</b>  |



| <b>Customer Complaints</b> |   |
|----------------------------|---|
| Puc 2006.01(o)             | <p>Use either the table below or a separate attachment to provide a list disclosing the number and type of customer complaints concerning the applicant or its principals and affiliates filed with or by any commission or regulatory agency, attorney general's office, or other governmental consumer protection regulatory authority, for the most recent 2 calendar years in every state or other jurisdiction in which the applicant has conducted business relating to the sale of electricity.</p> <p>In the table below, enter abbreviations of applicable states or the jurisdiction across the top row, complaint types in the left column, and, for each cell in the table, the number of complaints for each type within the applicable state or jurisdiction.</p> |

PLEASE SEE ATTACHMENT G

| Complaint Type | (enter applicable states/jurisdictions in row just below) |   |   |   |   |   |   |   |   |   | Total |
|----------------|---|---|---|---|---|---|---|---|---|---|-------|
|                |   |   |   |   |   |   |   |   |   |   |       |
|                |   |   |   |   |   |   |   |   |   |   | 0     |
|                |   |   |   |   |   |   |   |   |   |   | 0     |
|                |   |   |   |   |   |   |   |   |   |   | 0     |
|                |   |   |   |   |   |   |   |   |   |   | 0     |
|                |   |   |   |   |   |   |   |   |   |   | 0     |
|                |   |   |   |   |   |   |   |   |   |   | 0     |
|                |   |   |   |   |   |   |   |   |   |   | 0     |
|                |   |   |   |   |   |   |   |   |   |   | 0     |
|                |   |   |   |   |   |   |   |   |   |   | 0     |
|                |   |   |   |   |   |   |   |   |   |   | 0     |
|                |   |   |   |   |   |   |   |   |   |   | 0     |
|                |   |   |   |   |   |   |   |   |   |   | 0     |
|                |   |   |   |   |   |   |   |   |   |   | 0     |
| <b>Total</b>   | 0   | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0     |



| Statements Regarding Applicant and its Principals                     |   |     |
|---|---|-----|
| Respond to each of the following questions with either "Yes" or "No." |   |     |
| Puc 2006.01(p)(1)   | Has applicant or any of its principals ever been convicted of any felony that has not been annulled by a court?   | No  |
| Puc 2006.01(p)(2)   | Has applicant or any of its principals, within the 10 years immediately prior to application, had any civil, criminal, or regulatory sanctions or penalties imposed against it, him, or her pursuant to any state or federal consumer protection law or regulation? | Yes |
| Puc 2006.01(p)(3)   | Has applicant or any of its principals, within the 10 years immediately prior to application, settled any civil, criminal, or regulatory investigation or complaint involving any state or federal consumer protection law or regulation?                           | Yes |
| Puc 2006.01(p)(4)   | Is applicant or any of its principals currently the subject of any pending civil, criminal, or regulatory investigation or complaint involving any state or federal consumer protection law or regulation?  | Yes |
| Puc 2006.01(p)(5)   | Has applicant or any of its principals been denied authorization to provide competitive electricity supply service or electric aggregation service in any other state or jurisdiction?  | No  |
| Puc 2006.01(q)  | If an affirmative answer is provided to any item above, then provide a detailed explanation of the occurrence and the related circumstances. Use additional sheets as needed.<br><br>Please see Attachment H  |     |

| Telemarketing  |  |     |
|--|--|-----|
| Puc 2006.01(s)   | Does the applicant intend to telemarket? Respond with either "Yes" or "No."  | No  |
| If the response to the question above is "Yes," then respond to the following three questions: |  |     |
| Puc 2006.01(r)(1)  | Will the applicant maintain a list of customers who request being placed on the applicant's do-no-call list for the purposes of telemarketing?   | N/A |
| Puc 2006.01(r)(2)  | Will the applicant obtain monthly updated do-no-call lists from the National Do Not Call Registry?   | N/A |
| Puc 2006.01(r)(3)  | Will the applicant NOT initiate calls to New Hampshire customers who have either requested being placed on the applicant's do-not-call list(s) or who are listed on the National Do Not Call Registry? | N/A |

| In-Person Solicitation of Residential Customers   |   |    |
|---|---|----|
| Puc 2006.01(u)  | Does the applicant intend to enroll residential customers through in-person solicitation at the customer's residence? Respond with either "Yes" or "No."  | No |
| If the response to the question above is "Yes," then provide the following items as separate attachments: |   |    |
| Puc 2006.01(t)(1)   | A plan for in-person solicitation of residential customers at their residences, including provisions to ensure legal and regulatory compliance and quality assurance. n/a   |    |
| Puc 2006.01(t)(2)   | A description of the applicant's training program for employees or representatives who will conduct in-person solicitation of residential customers at their residences. n/a  |    |
| Puc 2006.01(t)(3)   | An identification of any third party vendor or vendors the applicant intends to use to conduct in-person solicitation of residential customers at their residences. n/a   |    |
| Puc 2006.01(t)(4)   | A copy of the applicant's performance standards and code of conduct for any employees, representatives, or vendors who or which will conduct in-person solicitation of residential customers at their residences. n/a |    |
| Puc 2006.01(t)(5)   | A copy of field audit standards used to evaluate the performance of employees, representatives, or vendors who or which will conduct in-person solicitation of residential customers at their residences. n/a         |    |



| Sample Bill Form |  |    |
|------------------|--|----|
| Puc 2006.01(v)   | Does the applicant intend to use only the utility's billing service? Respond with either "Yes" or "No."  | No |
| Puc 2006.01(v)   | If the response to the question above is "No," then provide a sample of the bill form(s) the applicant intends to use as a separate attachment. Direct Energy Business Marketing, LLC is not currently serving customers in NH. Direct Energy Business Marketing, LLC will provide a bill sample prior to beginning any service. |    |

| Residential and Small Commercial Customer Contracts   |   |    |
|---|---|----|
| Puc 2006.01(w)  | Does the applicant intend to serve residential and small commercial customers? Respond with either "Yes" or "No."   | No |
| If the response to the question above is "Yes," then provide the following item as a separate attachment: |   |    |
| Puc 2006.01(w)  | A copy of each contract to be used for residential customers and for small commercial customers, including any schedules or other documentation attached to, incorporated into, or referenced in such contract. n/a |    |

| File Financial Security Instrument                            |  |  |
|---|--|--|
| Refer to Puc 2003.03 for the financial security requirements. |  |  |
| Puc 2003.01(b)(2)   | Provide an original executed financial security instrument that meets the requirements of Puc 2003.03. DEBM, LLC original Bond 8239-86-76 was mailed to your office 12/2/2020, See Attachment I                                |  |
|   | File the original, executed financial security instrument with the Executive Director. The financial security instrument can be filed separately from the application form, by U.S. mail, overnight express, or hand delivery. |  |

| Submit Application Fee (For Initial Applications Only)                             |   |  |
|--|---|--|
| Puc 2003.01(b)(3)  | For an application for initial registration, submit payment of the application fee in the amount of \$250.00 to the Executive Director by U.S. mail, overnight express, or hand delivery. Make check payable to: New Hampshire Public Utilities Commission. |  |
| Note that there is no fee for a renewal application. This is a renewal application |   |  |

| Expected Marketing Start Date |   |                        |
|-------------------------------|---|------------------------|
| Puc 2006.01(x)                | Provide the date upon which the applicant expects to commence marketing its services to customers in New Hampshire. | <u>  n/a  </u><br>Date |

| Attestation and Signature |  |                          |
|---------------------------|--|--------------------------|
| Puc 2006.01(y) and (z)    | <p>BY SIGNING BELOW, THE APPLICANT REPRESENTATIVE CERTIFIES THAT IT HAS THE AUTHORITY TO FILE THE APPLICATION ON BEHALF OF THE CEPS AND ATTESTS THAT THE CONTENTS OF THE APPLICATION ARE TRUTHFUL, ACCURATE, AND COMPLETE.</p> <p><u>  Please see Attestation and Signature Attached  </u><br/>           Signature of the applicant or its authorized representative</p> <p>Name: _____</p> <p>Title: _____</p> | <p>_____</p> <p>Date</p> |

| Filing Instructions |  |  |
|---------------------|--|--|
|                     | <p>1) Mail an original and two paper copies of this form and all separate attachments to:<br/>           Executive Director, NHPUC, 21 South Fruit St., Suite 10, Concord, NH 03301</p> <p>2) E-mail a PDF of this form and all separate attachments to:<br/> <a href="mailto:Executive.Director@puc.nh.gov">Executive.Director@puc.nh.gov</a></p> |  |