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October 29, 2021

Via Federal Express

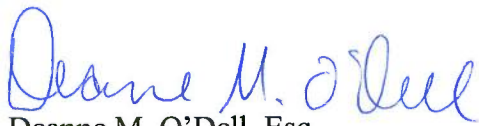
Louisiana Public Service Commission
Galvez Building, 12th Floor
602 North Fifth Street
Post Office Box 91154
Baton Rouge, Louisiana 70821-9154

RE: In Re: Rulemaking to Research and Evaluate Customer-Centered Options for All
Electric Customer Classes as well as Other Regulatory Environment
Docket No. R-35462

Dear Sir/Madam:

Enclosed for filing please find an original and two copies of the Retail Energy Supply Association's ("RESA") Motion for Leave to Intervene Out of Time and Inclusion of Service List regarding the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,



Deanne M. O'Dell, Esq.

DMO/lww
Enclosure

cc: Donnie Marks Staff w/enc. donnie.marks@la.gov
Lauren Evans Staff w.enc. lauren.evans@la.gov
Cert. of Service w/enc.

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

Louisiana Public Service Commission, Ex :
Parte :
: :
In Re: Rulemaking to Research and Evaluate : Docket No.: R-35462
Customer-Centered Options for All Electric :
Customer Classes as well as Other Regulatory :
Environments :

**MOTION FOR LEAVE TO INTERVENE OUT OF TIME AND
INCLUSION ON SERVICE LIST OF
RETAIL ENERGY SUPPLY ASSOCIATION**

Pursuant to Rule 10 of the Rules of Practice and Procedure of the Louisiana Public Service Commission (“LPSC” or “Commission”), the Retail Energy Supply Association (“RESA”)¹ submits this Motion for Leave to Intervene Out of Time and Inclusion on the Service list in the above captioned proceeding. In support of its Motion, RESA states as follows:

BACKGROUND OF PROCEEDING

1. Pursuant to a directive at the LPSC Business and Executive Session held on December 18, 2019, this proceeding was opened and LPSC Staff was directed to “research customer-centered options for all customer classes, as well as other regulatory environments, and recommend a plan for how to ensure customers are the focus” in Louisiana. *Notice of Proceeding* dated January 9, 2020.

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 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. The Notice of Proceeding was published in the LPSC's Official Bulletin No. 1210 with interventions due on or before February 4, 2020.

3. Since that time continuing through October 12, 2021, entities requested leave to intervene out of time in the proceeding. The LPSC has approved all late-filed interventions to date.

4. On August 3, 2020, the First Request for Information was issued by Commission Staff. At the end of September 2020, Responses were filed by some parties who had intervened in the proceeding at that time. In early October 2020, a request was made by Advanced Energy Management Alliance to submit responses out of time which included the responses.

5. On April 29, 2020, the Commission approved a motion to hire Stone Pigman Walther Wittmann, LLC.

6. Apart from the more recent request to intervene out of time in the proceeding, no other action has occurred at the docket.

RESA's INTEREST IN THE PROCEEDING

7. RESA only recently became aware of this docket. Upon further investigating, RESA members became very interested in assisting with the mission statement of this effort to "work with stakeholders to develop proposals that are meant to better align the policies and activities of the electric utilities and the regulations under which they operate with benefits to customers." *First Request for Information* at 1.

8. RESA is a trade association of retail energy suppliers who share the common vision that competitive retail electricity markets deliver a more efficient, customer-oriented outcome than does the monopoly-protected, rate-regulated utility structure. RESA members are licensed to sell electric energy in all open competitive markets and has been actively involved in other markets considering changes to their current market design.

9. RESA member companies have practical experience operating in competitive markets across the country and first-hand knowledge about how various policies and initiatives regarding competitive markets may positively impact customers by bringing them a diversity of energy products and service tailored to meet their individual needs. RESA members have also studied how competitive markets have delivered financial value to consumers by presenting competitive alternatives to the one-size-fits-all utility. As such, permitting RESA's intervention in this proceeding will benefit the Commission by providing more information, informed by experience, to assist in determining the best course of action for Louisiana consumers.

10. RESA's interest in this proceeding is assist the Commission in providing the benefit of its members' experience and study of retail competitive markets. In addition, RESA members have an interest in assisting with the development of policies and procedures designed to foster their ability to participate in the competitive market. RESA's members will be bound by the action of the Commission in this proceeding which may directly impact their ability (or lack of ability) to participate in the competitive market.

11. RESA's interests are not adequately represented by other electric competitive suppliers who may participate in this proceeding because RESA represents the interests of a diverse and broad group of competitive electric suppliers in general and not the interests of any individual member. In fact, there is much diversity among RESA member companies. Some companies have smaller operations that may only focus on a few service territories and/or customer classes. Other companies may be significantly larger with a variety of different affiliated companies and operations serving multiple customer classes. Member companies are also varied in terms of the jurisdictions in which they operate and how they market their products and services. Notwithstanding the diversity among its members, RESA members know the

benefits a functioning competitive market can bring to consumers and work to reach consensus among members about the policies and recommendations to offer in proceedings such as this. Because of this, RESA's interests are not adequately represented by other competitive suppliers who may be participating in this proceeding.

GOOD CAUSE EXISTS TO GRANT INTERVENTION

12. Granting RESA's intervention out of time will also not prejudice any other party or unduly delay the proceeding. RESA also agrees to accept the record of the proceeding as it currently exists. As explained previously, the docket is in its early stages and the Commission has more recently granted a Motion for Leave to Intervene Out of Time.

13. Good cause exists to grant RESA's intervention because RESA's participation will enable it to contribute the unique perspectives and insights of a trade association of competitive suppliers to offer a more complete presentation of the issues to be addressed in this proceeding.

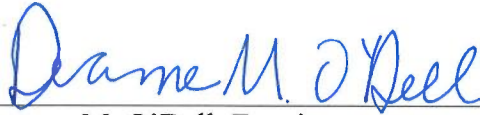
RESA'S REPRESENTATION

14. All communications and pleadings in this docket should be directed to:

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WHEREFORE, RESA respectfully requests that the Commission grant it intervenor status, with the right to fully participate in this proceeding. Further RESA requests that it be placed on the Official Service List and served with all pleadings, notices, orders, and other filings.

Respectfully submitted,



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Date: October 29, 2021

Attorneys for Retail Energy Supply Association

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of RESA's Motion for Leave to Intervene Out of Time and Inclusion on Service List upon the parties of record by email.

Via Email

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Dated: October 29, 2021



Deanne M. O'Dell, Esq.

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