



December 6, 2024

Sent via email

Letter L-31-24

Ms. Barbara Farmer
Licensing & Reporting Analyst
Direct Energy (B.C.) Limited
12 Greenway Plaza, Suite 250
Houston, TX 77046
Barbara.Farmer@nrg.com

Re: Direct Energy – Third-Party Verification Scripts for Commercial Customers

Dear Ms. Farmer:

On April 4, 2024, Direct Energy (B.C.) Limited (Direct Energy) filed with the British Columbia Utilities Commission (BCUC) a proposed Third-Party Verification (TPV) script for Commercial Customers (Proposed TPV Script) for BCUC review pursuant to Article 33 of the Code of Conduct for Gas Marketers (Code of Conduct).

On April 22, 2024, BCUC staff issued questions to Direct Energy, including one regarding the consumer agreements to which the Proposed TPV Script refers. On April 29, 2024, Direct Energy stated in its response to question 1.1 that the Proposed TPV Script will only apply to the “DEB BC Small Commercial Trigger” (Trigger Agreement) and “DEB BC Small Commercial Agreement” (Commercial Agreement).

On August 22, 2024, Direct Energy responded to a third round of questions, including an amended TPV script for exclusive use for Trigger Agreements as Attachment 1 (Proposed Trigger TPV Script). On October 25, 2024, Direct Energy responded to a fourth round of questions (Staff Questions No. 4) and proposed some amendments to the Proposed Trigger TPV Script in response to question 9.1 (Proposed Amendments).

The BCUC has reviewed Direct Energy's *Proposed TPV Script* and accepts the enclosed version for use in relation to the Commercial Agreement. Direct Energy is to use the approved script in all TPV calls regarding the Commercial Agreement until such time that the BCUC approves a new version of the script.

The BCUC has reviewed Direct Energy's *Proposed Trigger TPV Script* and finds adjustments are warranted. Direct Energy is to file by **December 13, 2024**, an updated version of the Proposed Trigger TPV Script that:

- incorporates the Proposed Amendments; and
- confirms the Consumer's understanding that the Consumer may revise the Trigger Price twice before the expiry date, provided that Direct Energy has not already executed the transaction, as per the Trigger Price Schedule that forms part of the Trigger Agreement.

Sincerely,

Electronically signed by Patrick Wruck

Patrick Wruck
Commission Secretary

GP/db
Enclosure (confidential)

cc: ryan.harwell@directenergy.com
nicole.black@nrg.com