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July 22, 2019

VIA ELECTRONIC FILING

Mr. Joel H. Peck, Clerk
Document Control Center
State Corporation Commission
1300 East Main Street - 1st Floor
Richmond, VA 23219

**Re: Petition of Virginia Electric and Power Company
For a declaratory judgment
Case No. PUR-2019-00117**

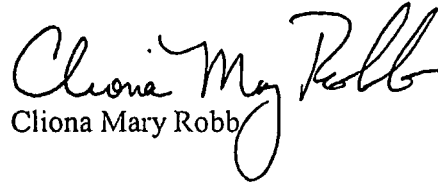
Dear Mr. Peck:

Enclosed for filing on behalf of Direct Energy Business, LLC is the *Motion of Direct Energy Business for Temporary Injunctive Relief and Request for Expedited Action*, together with a certificate of service, in the above referenced matter.

The Commission's acknowledgment of this filing should be e-mailed to me at crobb@cblaw.com.

If you should have any questions regarding this filing, please call me at (804) 697-4140. Thank you for your assistance.

Sincerely,


Cliona Mary Robb

Enclosure

cc: Certificate of Service

#2513344

COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

PETITION OF

VIRGINIA ELECTRIC AND POWER CO.

CASE NO. PUR-2019-00117

For a declaratory judgment.

**MOTION OF DIRECT ENERGY BUSINESS
FOR TEMPORARY INJUNCTIVE RELIEF
AND REQUEST FOR EXPEDITED ACTION**

Pursuant to Rules 100 and 110¹ of the Rules of Practice and Procedure of the State Corporation Commission (“Commission”), Direct Energy Business, LLC (“Direct Energy Business”), by counsel, respectfully submits this Motion for Temporary Injunctive Relief (“Motion”) directing Virginia Electric and Power Company d/b/a Dominion Energy Virginia (“Dominion”) immediately to process all pending enrollment requests by Direct Energy Business to provide competitive supply service to its customers, and to process in a timely manner any such future enrollment requests, at least until such time as Dominion’s Petition for Declaratory Judgment against Direct Energy Business (“Petition”) in this matter is resolved. Direct Energy Business requests that the Commission rule on this Motion on an expedited basis on or prior to July 31, 2019. In support hereof, Direct Energy Business states as follows:

BACKGROUND

1. Direct Energy Business is a competitive service provider (“CSP”) licensed to provide electric supply service to commercial, industrial and governmental customers in Virginia, including customers located in Dominion’s service territory that seek to purchase 100%

¹ 5 VAC 5-20-100 and -110.

renewable energy pursuant to Va. Code § 56-577 A 5 (“Section A 5”).²

2. Dominion is a for-profit public service corporation organized under the laws of the Commonwealth of Virginia. It provides electric service to the public within its Virginia service territory, and specifically to the customers who have asked to take supply service from Direct Energy Business and as to whom Dominion has denied Direct Energy Business’s requests for enrollment.

3. On July 15, 2019, Dominion filed its Petition in this matter, alleging that Direct Energy Business has sought to enroll customers of Dominion to take competitive supply service of “electric energy provided 100 percent from renewable energy” from Direct Energy Business pursuant to Section A 5, but that Direct Energy Business “has not satisfactorily demonstrated that it can serve customers” with 100% renewable energy pursuant to Section A 5. Specifically, Dominion complains that Direct Energy Business has not provided documentation that it has sufficient control of renewable generation resources, including “renewable capacity.”³

4. Based upon its own interpretation of a “renewable capacity” requirement, which has not been established by statute, regulation, or Commission order, Dominion has taken its hostility towards competitive suppliers to a new level, fulfilling the role as judge, jury, and executioner by unilaterally deciding not to process pending or future requests for enrollment of Direct Energy Business customers for service pursuant to Section A 5 while this proceeding on its Petition is pending.⁴

5. Direct Energy Business vehemently disagrees with Dominion’s “renewable capacity” requirement, and looks forward to establishing in the course of this proceeding that it

² Application of Direct Energy Business, LLC, For A License To Conduct Business As An Electricity Competitive Service Provider, SCC Case No. PUR-2017-00085 (Order Granting License, July 24, 2017).

³ Petition, p. 1.

⁴ *Id.*, pp. 4 and 16.

will supply customers served under Section A 5 with 100% renewable energy, and that it has already adequately documented its ability to do so. For the purpose of this Motion, Direct Energy Business will demonstrate that Dominion lacks any authority to unilaterally impose its “renewable capacity” requirement by denying service to Direct Energy Business’s customers while the existence of any such requirement is being litigated.

6. In seeking to impose its preferred definition of 100% renewable energy in order to deny service to Direct Energy Business customers while the Petition is pending, Dominion relies upon Section 10 of its CSP Coordination Tariff and Rule 70 E of the Commission’s Retail Access Rules.⁵ Neither Section 10 nor Rule 70 E, however, provide any support for the self-help relief that Dominion has granted itself.

7. In fact, Section 10 of Dominion’s CSP Coordination Tariff clearly establishes that Dominion may NOT refuse to enroll Direct Energy Business’s customers in these circumstances. Section 10 provides the process for enrollment of CSP customers. The only requirements of Section 10 that require validation prior to enrollment relate to satisfaction of that process, which includes “all provisions of 20 VAC 5-312-80.” Notably, it does not incorporate the provisions of Rule 70, or specifically Rule 70 E. Direct Energy Business and its customers have satisfied the requirements of Section 10 and Rule 80, and Dominion has not alleged otherwise.

8. Unlike Rule 80, which establishes the requirements for “Enrollment and Switching,” Rule 70 only relates to “Marketing.” Rule 70 E allows a local distribution company such as Dominion to request documentation from a CSP to substantiate claims of “special attributes.” It does not, however, provide a local distribution company with the self-help remedy of refusing to process enrollments if it is dissatisfied with the documentation provided. And it

⁵ 5 VAC 5-312-70 E.

most certainly does not provide such a self-help remedy where the adequacy of such documentation is disputed.

9. Pursuant to Section XXIV of the Terms and Conditions of Dominion's Tariff, the Company may only discontinue or deny service to a CSP in limited and prescribed circumstances, none of which are present in this matter:

The Company may discontinue or deny services to any Provider to prevent utilization of the Company's services by such Provider in connection with practices which are illegal, or which are detrimental to the provision of Electric Service to other Customers of the Company. The Company may discontinue or deny services to any Provider if the Provider fails to comply with the Company's CSP Coordination Tariff and related rules or if the Company is directed to do so by the Commission or any other governmental authority.

In this case, as noted above, Direct Energy Business has complied with all of the requirements of the CSP Coordination Tariff and the Retail Access Rules for customer enrollment. Dominion is not empowered to declare Direct Energy Business's sales to customers under Section A 5 "illegal" based on Dominion's unilateral, unsupported and disputed "renewable capacity" requirement – which is the very subject of this proceeding. Neither the Commission nor any other governmental authority has made such a ruling. Significantly, the only detriment to other customers that Dominion has alleged would be the result of any cost-shifting, which has not been established, and – to the extent it does result – would be the consequence of the General Assembly's unequivocal decision to permit shopping under Section A 5 in the first place. Dominion should not be allowed to unilaterally impose its own, self-serving interpretation of the rules and in doing so, prevent customers from exercising their statutory right to choose a CSP for a 100% renewable product.

10. Dominion's decision to deny service to Direct Energy Business's customers,

before the Commission has even had a chance to consider and rule on its declaratory judgment action, is unsupported by Virginia law and Commission precedent and is just the latest in a series of efforts by Dominion to frustrate the purpose of Va. Code § 56-577 and to interfere with the efforts of Direct Energy Business to do business in Virginia as a licensed CSP.⁶

11. Dominion's repeated efforts to frustrate the rights of its customers to obtain supply service from CSPs, which on multiple occasions have been proven to have no support under Virginia law, impose unnecessary and significant costs both on CSPs and on Dominion's own customers, who are forced to bear the costs of such actions. Clearly, this is another in a series of ironic and tragic examples of Dominion using dollars collected from its own customers to fund efforts to block those same customers who are trying to secure a 100% renewable product from CSPs allowed under the statute and thus contravening the will of the Commonwealth of Virginia's legislature.

12. If Dominion's concerns about the ability of Direct Energy Business to supply 100% renewable energy were sincere, Dominion could have and should have raised the issue of "renewable capacity" much earlier in the CSP registration process. It is more than a coincidence that Dominion's foot dragging and delay tactics in this case appear to relate to its pending application for its own renewable energy tariff⁷ which, if approved, would block CSPs from offering this service and also relate to its market-based rate tariff application, which overtly cites

⁶ See, e.g. Commission Case No. PUE-2016-00088 (Direct Energy Business CSP licensure application that was granted despite being contested by Dominion); Commission Case No. PUE-2016-00094 (Direct Energy Business declaratory judgment petition, which sought confirmation that the five year notice provision does not apply to renewable energy purchases and which was granted by the Commission despite being contested by Dominion and which was upheld by the Virginia Supreme Court despite being contested by Dominion); Commission Case No. PUR-2017-00085 (Direct Energy Services CSP licensure application that was granted despite being contested by Dominion).

⁷ See Petition, p. 5, and SCC Case No. PUR-2019-00094.

competing against CSPs as one of its main reasons for implementation.⁸

13. The denial, or any significant further delay, by Dominion in enrolling Direct Energy Business's customers places Direct Energy Business's agreements and relationships with those customers, its contracts for renewable generation, and financial hedges at serious and immediate risk.

14. As is evident from Exhibit 4 to the Petition, Direct Energy Business has entered into a wholesale arrangement to provide the 100% renewable energy needed to comply with Section A 5. Contrary to Dominion's assertions in the Petition, but consistent with the unambiguous language in the Transaction Confirmation attached as Exhibit 4 to the Petition, the Transaction Confirmation "will constitute binding and conclusive evidence of the Transaction." Direct Energy Business entered into this wholesale arrangement to comply with Section A 5 and would not have entered into it otherwise. Thus, Direct Energy Business has arranged to purchase energy at wholesale but is unable to serve all of its retail customers that seek to purchase pursuant to Section A 5.

15. The Petition is contrary to Virginia law and Commission precedent, and Direct Energy Business looks forward to the opportunity to provide a full response to the Petition pursuant to the procedural directions to be established by the Commission pursuant to Rule 100 C.⁹ In the meantime, however, the malevolent tactics employed by Dominion must be finally called out, and Dominion should be required immediately to process all pending enrollment requests by Direct Energy Business to provide competitive supply service to its customers, and

⁸ Commission Case No. PUR-2018-00192, *Application of Virginia Electric and Power Company for approval to establish rate schedule, designated rate schedule MBR, pursuant to §56-234 of the Code of Virginia*, Morgan Direct Testimony at 23 (noting that the application provides Dominion with "an avenue for the Company to compete with third party suppliers of electric energy licensed to sell electric energy within the Commonwealth.")

⁹ 5 VAC 5-20-100 C.

to process in a timely manner any such future enrollment requests, until such time as Dominion's request for a Declaratory Judgment against Direct Energy Business in this matter is resolved.

16. Such action would be entirely consistent with the most relevant Commission precedent on this matter. Appalachian Power Company ("APCo") sought in Commission Case No. PUR-2018-00039 to revoke a CSP license based in part on APCo's dissatisfaction with a CSP's response to a Rule 70 E request,¹⁰ and APCo also sought in Commission Case No. PUR-2018-00134 to revoke a CSP's license based on APCo's attempt to impose a "renewable capacity" obligation on a CSP.¹¹ In PUR-2018-00039, the Commission found fault with the CSP's response to a Rule 70 E request,¹² and in PUR-2019-00134, the Commission rejected APCo's attempt to impose a "renewable capacity" obligation on a CSP.¹³ In neither of these cases did the Commission endorse any action that resulted in disruption to the CSP's service to its customers, despite APCo's allegations that the CSP's license should be revoked. Here, the same result should apply. Until Dominion proves that (a) its yet-to-be-established concept of "renewable capacity" applies to CSPs, (b) that Direct Energy Business has failed to comply with this yet-to-be-established concept of "renewable capacity," and (c) that such failure justifies cutting off a CSP's ability to serve its customers, Dominion should be enjoined from unilaterally imposing what could amount to a death sentence for business customers wanting a 100% renewable product from a CSP, given Dominion's pending application seeking approval of a Section A 5 100% renewable energy tariff which at the end of the process may not be approved

¹⁰ September 21, 2018 Final Order in PUR-2018-00039 at 3 (noting that APCo's allegations included refusal to comply with an obligation to respond to APCo's request).

¹¹ June 11, 2019 Final Order in PUR-2018-00134 at 2 (noting the Hearing Examiner's finding that "APCo failed to establish a reasonable basis for the Commission's adoption of a renewable capacity requirements under . . . Section A 5.")

¹² September 21, 2018 Final Order in PUR-2018-00039 at 6 (directing the CSP "to establish written procedures to document and track any future requests received pursuant to Subsection E of the Marketing Rules").

¹³ June 11, 2019 Final Order in PUR-2018-00134 at 6 ("Appalachian has not established that the adoption of a renewable capacity standard based on PJM's wholesale reliability requirement is reasonable in this case.")

by the Commission or which Dominion may choose to withdraw, “conveniently” leaving its customers without a 100% renewable option.

THE COMMISSION’S INJUNCTIVE AUTHORITY

17. The Commission has jurisdiction over the subject matter of this Motion. The Commission has the power and is charged with the duty of regulating the rates, charges, services, and facilities of electric utility companies operating within the Commonwealth. Va. Const. Art. IX, § 2. The Constitution of Virginia and statutes enacted by the General Assembly give the Commission broad authority over the control and regulation of public service companies. *Piedmont Envtl. Council v. Virginia Elec. and Power Co.*, 278 Va. 553, 562, 684 S.E.2d 805, 810 (2009).

18. The Code provides that “any person aggrieved by anything done or omitted in violation of any of the provisions of [Title 56], by any public service corporation chartered or doing business in the Commonwealth, shall have the right to make complaint of the grievance and seek relief by petition against such public service corporation before the [Commission], sitting as a court of record.” Va. Code § 56-6. When such a grievance is established, the Commission has jurisdiction, by injunction, to restrain the public service corporation from continuing the violation and to require compliance with the requirements of the law. *Id.*

19. The Code also provides that “[t]he Commission shall have the power, and be charged with the duty, of supervising, regulating and controlling all public service companies doing business in this Commonwealth, in all matters relating to the performance of their public duties and their charges therefor, and of correcting abuses therein by such companies.” Va. Code § 56-35.

20. The Commission is empowered, upon finding the practices or acts of a public

utility are "unjust, unreasonable, insufficient, preferential, unjustly discriminatory or otherwise in violation of law or if it be found that any service is inadequate or that any reasonable service cannot be obtained," to substitute therefore and make orders respecting and changes in such practices and acts as shall be just and reasonable. Va. Code § 56-247.

21. Additionally, Va. Code § 12.1-13 grants the Commission the authority "to enter into appropriate orders, and to issue temporary and permanent injunctions."

22. The Commission may issue a temporary injunction without any showing of irreparable harm. From the discussion herein, it is clear that Dominion's refusal to process enrollments violates Virginia law that the Commission is required to administer and enforce. The Commission, therefore, is fully empowered to grant the requested injunctive relief against such violations without a showing by Direct Energy Business that its request meets the typical requirements for an injunction, such as irreparable harm and no adequate remedy at law.¹⁴ As the Virginia Supreme Court has stated:

When the General Assembly determines that certain conduct is inimical to the public interest, a petition for an injunction 'need not contain an allegation of irreparable injury' [Citation omitted]. Here, the General Assembly has expressly mooted the irreparable-injury inquiry. Complainants were not required to negate the existence of an adequate remedy at law. The only proof mandated by the statute was proof of respondent's violation of the regulation.¹⁵

23. Nonetheless, as explained herein, Direct Energy Business satisfies the traditional elements needed for injunctive relief because Direct Energy Business (1) is likely to succeed on

¹⁴ *Virginia Beach S.P.C.A., Inc. v. South Hampton Roads Veterinary Ass'n, et al.*, 229 Va. 349, 354 ("When a statute empowers a court to grant injunctive relief, the party seeking an injunction is not required to establish the traditional prerequisites, i.e., irreparable harm and lack of adequate remedy at law, before the injunction can issue. All that is required is proof that the statute or regulation has been violated. *Carbaugh v. Solem*, 225 Va. 310, 314-15, 302 S.E.2d 33, 35 (1983).")

¹⁵ *Carbaugh v. Sole*, 225 Va. 314-315.

the merits concerning Dominion's lack of authority to cease processing enrollments under these circumstances; (2) is likely to suffer irreparable harm in the absence of preliminary relief; (3) has established that the balance of equities tips in its favor; and (4) has established that an injunction is in the public interest.¹⁶

24. Accordingly, the Commission has the jurisdiction and authority to provide the injunctive relief requested by Direct Energy Business.

LEGAL BASIS FOR RELIEF REQUESTED

25. Pursuant to Va. Code § 56-577 A 5, "individual retail customers of electric energy within the Commonwealth, regardless of customer class, *shall be permitted* . . . [t]o purchase electric energy provided 100 percent from renewable energy from any supplier of electric energy licensed to sell retail electric energy within the Commonwealth" Dominion may not effectively deny such customers their rights under Va. Code § 56-577 A 5 by refusing to enroll Direct Energy Business's customers in violation of its own CSP Coordination Tariff and the Commission's Retail Access Rules.¹⁷

26. In addition, Dominion's own Competitive Service Provider Coordination Tariff, at § 3.6, provides as follows:

The Company shall provide the CSP with Coordination Services as necessary for the delivery of Electricity Supply Service to its Retail Customers located within the Company's service territory. The Company and the CSP will cooperate to ensure delivery of Electricity Supply Service to Customers. The CSP and the Company shall exchange all data, materials, or other information that is specified in this Tariff in accordance with Commission approved Rules and VAEDT defined standards, and that may otherwise be reasonably required by the CSP or the Company in connection with their obligations under this Tariff.

¹⁶ See, e.g., *Petition of William C. Barnhardt, For declaratory and injunctive relief*, Case No. PUE-2015-00109, Order at 3 (Oct. 19, 2015) (citations omitted).

¹⁷ Rules Governing Retail Access to Competitive Energy Service, 2- VAC 5-312-10, et seq.

Direct Energy Business has provided all of the information and materials required by Dominion's Tariff and the Commission's Rules, and to the extent that Dominion continues to seek increasingly detailed and commercially sensitive documentation related to a "renewable capacity" concept that has not been established under Virginia law, its request is not reasonable.

27. Dominion is therefore denying adequate service to Direct Energy Business and to its customers, who are also Dominion's customers; is denying a reasonable request for services; and is engaging in practices and acts that are unjust, unreasonable, insufficient, preferential, unjustly discriminatory and otherwise in violation of law, all being in violation of Va. Code §§ 56-577 A 5 and 56-247.

REQUEST FOR EXPEDITED ACTION

28. Any further refusal or delay by Dominion in enrolling Direct Energy Business's customers will put at serious and immediate risk Direct Energy Business's contracts and relationships with those customers, as well as with other potential customers who may seek supply service from Direct Energy Business while the Petition is pending.

29. The risk to Direct Energy Business and its customers already exists and increases each day. Accordingly, Direct Energy Business requests that the Commission establish an expedited schedule and address this Motion as soon as possible.

30. The allegations of this Motion support Direct Energy Business's request for expedited injunctive relief because they establish:

(1) that Direct Energy Business is likely to succeed on the merits. At this point in the proceeding, Dominion has no basis in the relevant statutes, regulations or Commission orders to refuse to enroll Direct Energy Business's customers;

(2) that Direct Energy Business is likely to suffer irreparable harm in the absence of

preliminary relief. Both its current and potential customers are at risk;

(3) that the balance of equity tips in favor of Direct Energy Business. Even if the Commission determines that Direct Energy Business should produce additional or different documentation that it will supply 100% renewable energy, it should be afforded the opportunity to do so, and if it is unable to do so the relevant customers can be switched back to Dominion, but if Dominion is permitted to prevent Direct Energy Business from serving customers while the issue is being litigated, those customers may well be lost forever; and

(4) that an injunction is in the public interest.¹⁸ The public interest at issue includes assuring the fair and non-discriminatory treatment of public utility and CSP customers, and in supporting the practical application of the statutes and regulations cited.

31. The affidavit of Raymond E. Polakowski in support of this Motion is attached.

CONCLUSION

WHEREFORE, Direct Energy Business respectfully requests that the Commission:

(A) enter an order directing Dominion immediately to process all pending enrollment requests by Direct Energy Business to provide competitive supply service to its customers, and to process in a timely manner any such future enrollment requests, until such time as Dominion's request for a Declaratory Judgment against Direct Energy Business in this matter is resolved; and

(B) to the extent the Commission deems that a response by Dominion, a reply by Direct Energy Business, or oral argument by the parties is appropriate, that the Commission schedule these on an expedited basis so that final action by the Commission on the Motion may be concluded on or before July 31, 2019, given the immediate harm to business customers and Direct Energy Business through Dominion's unilateral actions to withhold enrollments;

¹⁸ *Petition of William C. Barnhardt*, (SCC Case. No. PUE-2015-00109, Order of October 19, 2015, p. 3) (citing *Winter v. Natural Resources Defense Council, Inc.*, 129 S.Ct. 365, 374 (2008) (further citations omitted).

(C) order Dominion to pay for and launch a customer awareness effort within 30 days of the Commission order on this Motion, with such awareness effort and messaging (a) to target business customers of all sizes, letting such customers know that they have the statutory right to select a 100% renewable power product from a CSP and (b) to be led by the Commission Staff and, to the extent feasible, developed collaboratively with input from Dominion, the Attorney General's Office of Consumer Counsel, business customers and trade associations, and active competitive service providers; and

(D) order such other relief as the Commission may deem appropriate.

Respectfully submitted,

DIRECT ENERGY BUSINESS, LLC

By: Cliona Mary Robb
Counsel

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Dated: July 22, 2019

COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

PETITION OF

VIRGINIA ELECTRIC AND POWER CO.

CASE NO. PUR-2019-00117

For a declaratory judgment.

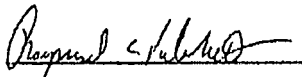
AFFIDAVIT OF RAYMOND E. POLAKOWSKI II

I, Raymond E. Polakowski II, having been duly sworn, do hereby swear and confirm the following under oath:

1. I reside in Metuchen, New Jersey.
2. I am the Commercial Development Manager – Wholesale for Direct Energy Business, LLC (“Direct Energy”).
3. All of the facts alleged in Direct Energy’s Petition in this matter are true to the best of my knowledge information and belief.
4. Any further refusal or delay by Dominion in enrolling Direct Energy’s customers will put at serious and immediate risk Direct Energy’s contracts and relationships with those customers, as well as with other potential customers who may seek supply service from Direct Energy while Dominion’s Petition is pending.
5. The risk to Direct Energy and its customers already exists and increases each day.

Date: July 22, 2019

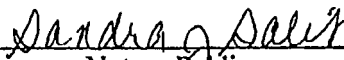
Further affiant sayeth not.



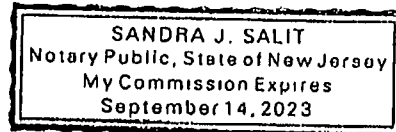
Raymond E. Polakowski II

State of
County/City of

Subscribed and sworn before me this 22 day of ^{July} ~~June~~, 2019. In testimony whereof, I have hereunto set my hand the day, month, and year aforesaid.


Notary Public

My commission expires:



#2513325

190730162

CERTIFICATE OF SERVICE

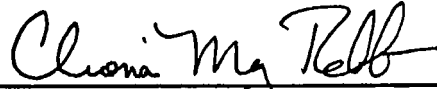
I hereby certify that a true copy of the foregoing was hand-delivered, emailed, and/or mailed first-class postage prepaid, to the following on this 22nd day of July, 2019:

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