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Arizona Corporation Commission

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MUNGER CHADWICK
ATTORNEYS AT LAW

December 18, 2013

Docket Control
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

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Re: Commission's Inquiry into Potential Impacts to the Current Utility Model Resulting from Innovation and Technological Developments in Generation and Delivery of Energy Docket No. E-00000J-13-0375 (pertaining to closed Docket No. E-00000W-13-0135, Commission's Inquiry into Retail Electric Competition)

To Whom It May Concern:

In the third paragraph of his December 6, 2013 letter to his fellow Commissioners and Interested Stakeholders, which was docketed in Docket No. E-00000J-13-0375 on December 6, 2013, Commissioner Robert L. Burns requested that the electric utilities therein enumerated and "other stakeholders" answer three (3) questions therein below set forth to the extent applicable to each. This letter is submitted on behalf of Direct Energy Services, LLC ("Direct Energy") in response to the aforesaid questions.

Answer to Question No. 1: In Docket No. E-00000W-13-0135, Direct Energy participated as a member of the Retail Competition Advocates group. Direct Energy is also a member of Arizonans for Electric Choice and Competition ("AECC"). Information pertaining to Direct Energy's lobbying expenditures in connection with its participation in the aforesaid generic docket on retail electric competition is included in information that AECC will be submitting in Docket No. E-00000J-13-0375 in response to Commissioner Robert L. Burns' December 6, 2013 request.

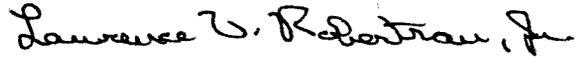
Answer to Question No. 2: No members of Direct Energy's salaried staff spent any time on a public relations campaign in support of its position in the generic proceeding on retail electric competition.

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Answer to Question No. 3: Direct Energy is not a regulated utility or a regulated public service corporation within the meaning of those terms under Arizona law at this time, and thus question No. 3 is not applicable.

Thank you for your assistance in docketing this letter.

Sincerely,



Lawrence V. Robertson, Jr.

Attorney for Direct Energy Services, LLC