

STATE OF NEW HAMPSHIRE

Inter-Department Communication

DATE: March 6, 2013

AT (OFFICE): NHPUC

FROM: Robert J. Wyatt *RJW*
Utility Analyst IV

SUBJECT: Staff Recommendation
DM 12-357 Howard Energy Services, Inc.
Natural Gas Aggregator Registration Application

TO: Debra Howland
Executive Director

Staff has completed its review of the natural gas aggregator registration application for Howard Energy Services, Inc. The registration application was filed on December 18, 2012. Staff determined the application was incomplete and filed a deficiency letter on December 21, 2012. The applicant filed updates on March 4, 2013 to address certain deficiencies in its original application. The registration application is now complete and in compliance with the requirements of Administrative Rule Puc 3003.04, Registration for Natural Gas Aggregators.

Staff recommends approval of the application for Howard Energy Services, Inc. as a natural gas aggregator in New Hampshire. The effective date should be set to coincide with date of the approval letter. This is an initial natural gas aggregator registration and as such carries a term of two years from the approval date.

Staff does note that Howard Energy Services, Inc. had conducted some gas aggregator activities in New Hampshire prior to applying for its natural gas aggregator registration. Howard Energy Services, Inc. was notified by a registered NH supplier it was dealing with that the supplier's recent renewal registration was conditionally approved because the CNGS disclosed existing NH business arrangements with gas aggregator entities that were not in compliance with Puc 3003.04 registration requirements. As a result, Howard Energy Services, Inc. has filed this application to become a registered gas aggregator in NH. Staff is working with the registered NH suppliers to get entities such as this registered and in compliance with Commission rules. Staff is not aware of any consumer complaints related to Howard Energy Services, Inc. Nonetheless, it may be appropriate to remind Howard Energy Services, Inc. of its responsibility to fully comply with the requirements of Puc 3000 related to natural gas aggregators going forward. Should you have any questions regarding this registration application, please do not hesitate to contact Robert Wyatt of the Gas/Water Division.

Cc: Service List (electronically)