


# STATE OF NEW HAMPSHIRE

Inter-Department Communication


NHPUC 30MAR'17PM2:53

DATE: March 30, 2017  
AT (OFFICE): NHPUC

  
**FROM:** David Goyette, Utility Analyst III

**SUBJECT:** DM 17-044, First Point Power, LLC  
Renewal of Registration as Competitive Electric Power Supplier

**TO:** Commissioners  
Debra Howland, Executive Director



## Executive Summary

First Point Power has applied to renew its registration as a competitive electric power supplier. First Point Power's current registration expires on June 4, 2017. First Point Power submitted a sample residential and small commercial customer contract, certificates demonstrating it completed EDI testing with Eversource, Liberty, NHEC, and Unitil, and a continuation certificate extending the term, by one year, of its currently effective surety bond in the amount of \$350,000, and a request for a waiver of the five-year and 90-day term requirement for financial security. If the Commission were to grant the requested rule waiver, Staff believes the filing is acceptable. Staff recommends that the Commission grant the waiver and approve the application for a registration period ending on the termination date of the surety bond as extended.

## Background and Analysis

On March 17, 2017, First Point Power, LLC (First Point Power) filed an application to renew its registration as a competitive electric power supplier (CEPS). First Point Power's currently active registration, which the Commission approved in Docket DM 16-221, expires on June 4, 2017. First Point Power's application included a residential and small commercial customer contract and certificates demonstrating that it has completed electronic data interchange (EDI) with Public Service Company of New Hampshire d/b/a Eversource Energy (Eversource), Liberty Utilities (Granite State Electric) Corp. (Liberty), and Unitil Energy Systems, Inc. (Unitil). On March 30, 2017, First Point Power filed a certificate demonstrating that it has completed electronic data interchange (EDI) testing with New Hampshire Electric Cooperative, Inc. (NHEC), a certificate extending the term of its currently effective surety bond, which is in the amount of 350,000 and names the Commission as obligee, to June 4, 2018 and a request for a waiver of Puc 2003.03(a)(5), which requires the financial security filed with an initial CEPS application have a term of five years and 90 days.

Staff has reviewed the information in the application and, if the Commission were to grant approval of the waiver request, believes it meets the requirements of Puc 2003

and 2006.01. Staff recommends that the Commission grant the request for a waiver of Puc 2003.03(a)(5) and, because the surety bond does not meet the five-year and 90-day term requirement and because it expires on June 4, 2018, that the Commission approve a registration period concurrent with the extended surety bond, beginning on the expiration date of the currently active registration, June 5, 2017, and ending at the close of business on June 4, 2018. Staff also recommends that the Commission notify First Point Power that the financial security rules are likely to change during 2017 and that First Point Power should monitor the rulemaking process in Docket DRM 16-853 and plan accordingly with respect to future operations in New Hampshire.

First Point Power filed documentation that demonstrates it has completed EDI testing with Eversource, Liberty, NHEC, and Unitil. Staff therefore recommends that the Commission approve First Point Power's application to renew its registration as a CEPS, and permit First Point Power to serve residential and small commercial customers and to operate in the service areas of Eversource, Liberty, NHEC, and Unitil.

**SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED**

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**Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.**

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**FILING INSTRUCTIONS:**

- a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:**

DEBRA A HOWLAND  
EXECUTIVE DIRECTOR  
NHPUC  
21 S. FRUIT ST, SUITE 10  
CONCORD NH 03301-2429

- b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.**
- c) Serve a written copy on each person on the service list not able to receive electronic mail.**