



July 6, 2018

Debra A. Howland, Executive Director
NHPUC
21 S. Fruit Street, Suite 10
Concord, NH 03301-2429

RE: DM 17-170 Request for Waiver

Dear Ms. Howland,

Pursuant to Puc 201.05 of the New Hampshire Code of Administrative Rules, Competitive Energy Services, LLC ("CES") is requesting a limited waiver from Puc 3003.05 Renewal Registration of Natural Gas Aggregators due to extenuating circumstances.

CES received its initial registration as a Natural Gas Aggregator from the New Hampshire Public Utilities Commission on May 17th, 2004. This initial registration was renewed on the following dates for the following time periods: May 17th, 2006, May 17th, 2008, May 17th, 2010, and May 16th, 2012.

In each case, the renewal was handled by my predecessor, who became ill and passed away this past summer. When I took over for him and sorted through all the documentation for the company's various licenses and registrations, I realized that CES failed to file our renewal registration in New Hampshire, which had expired on May 15, 2017. I acted promptly to correct this situation by filing a renewal and the required fee amount on October 27, 2017. The fee amount was deposited by the Commission on October 27, 2017.

Section Puc 201.05 establishes states that for the Commission to grant a waiver it must find that (1) the waiver serves the public interest and (2) the waiver will not disrupt the orderly and efficient resolution of matters before the commission; and further that in determining the public interest, the Commission shall waive a rule if (1) Compliance with the rule would be onerous or inapplicable given the circumstances of the affected person Or (2) the purpose of the rule would be satisfied by an alternative method proposed.

In this instance, CES believes that the waiver serves the public interest by allowing CES to continue to serve our New Hampshire natural gas customers without interruption of unnecessary inconvenience. An interruption in our license could cause negative effects to our clients, to the businesses we work with in New Hampshire and to the various competitive natural gas suppliers with whom CES has relationships. Further, to the best of our knowledge, the waiver will not disrupt the orderly and efficient resolution of matters before the commission. The renewal application filed with the Commission over eight (8) months ago represents a continuation of CES long-standing activities in New Hampshire.

We regret our delay in not filing for the renewal in a more timely manner and will make certain that this does not happen again. Accordingly, we ask the Commission to waive the rule noted above in this limited context and to accept the October 27, 2017 renewal application and accompanying fee filed by CES.

Thank you for your consideration in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynn Gallagher", with a long horizontal flourish extending to the right.

Lynn Gallagher

Controller

Competitive Energy Services, LLC

(207) 772-6190 ext, 223