



August 28, 2019

Debra A. Howland, Executive Director
New Hampshire Public Utilities Commission
21 South St., Suite 10
Concord, NH 03301

Subject: Application for Renewal of Registration as Electric Aggregator

Dear Ms. Howland:

Enclosed you will find our renewal of “Notice of Intent to Provide Electric Aggregation Services” in the State of New Hampshire. An electronic version (PDF format) has been submitted via email to Executive.Director@puc.nh.gov.

Please do not hesitate to contact us if you have questions.

Best,

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

Lynn Gallagher
Controller



Electric Load Aggregation Application Form

This form may be used to: (1) apply for initial registration as an electric load aggregator in New Hampshire, (2) apply for renewal of registration as an electric load aggregator in New Hampshire, and (3) notify the Commission of any changes to information in a previously-filed electric aggregator application form. *This form is provided as a convenience for filing only; you are required to provide all information specified under Puc 2006.02 when applying for initial or renewal registration as an electric aggregator, but you are not required to use this form when doing so.*

Indicate whether this application is for an initial registration or for a renewal. Initial <input type="checkbox"/> Renewal <input checked="" type="checkbox"/>	
Applicant's General Information	
Puc 2006.02(a)	Legal Name Competitive Energy Services, LLC
	Trade Name (d/b/a) (if applicable)
Puc 2006.02(b)	Business Mailing Address 148 Middle St., Suite 500 Portland, ME 04101
	Telephone Number 207-772-6190
	E-Mail Address sales@competitive-energy.com
	Website Address (if applicable) https://www.competitive-energy.com
	Provide the name(s), title(s), business address(es), telephone number(s), and e-mail address(es) of the applicant, if an individual, or of the applicant's principal(s), ¹ if the applicant is anything other than an individual. Use additional sheets if your response exceeds the space provided on the form.
Puc 2006.02(c)	Name Andrew Price
	Title President & Chief Operating Officer
	Business Mailing Address 148 Middle St., Suite 500 Portland, ME 04101
	Telephone Number 207-772-6190
	E-Mail Address aprice@competitive-energy.com
	Name Richard Silkman
	Title Chief Executive Officer
	Business Mailing Address 148 Middle St., Suite 500 Portland, ME 04101
	Telephone Number 207-772-6190
	Email Address rsilkman@competitive-energy.com
	Name
	Title
	Business Mailing Address
	Telephone Number -
	E-Mail Address

¹ "Principals" means, for a corporation, any of its officers, directors, or controlling shareholders, for a limited liability company, any of its managers or controlling members, for a partnership, any of its general partners, and for any other business entity, any of its personnel exercising executive functions and any of its controlling equity owners.



Customer Service Contact		
Puc 2006.02(d)	Name	Alexandra Ulrich
	Title	Associate Marketing Manager
	Telephone Number	207-772-6190
	Toll-Free Telephone Number (if available)	866-408-4951
	E-Mail Address	aulrich@competitive-energy.com

Customer Complaints Contact		
Puc 2006.02(e)(1)	Name	Linda Hyatt
	Title	Managing Director, Pricing
	Business Mailing Address	148 Middle St., Suite 500
		Portland, ME 04101
	Telephone Number	207-772-6190
E-Mail Address	lhyatt@competitive-energy.com	

Regulatory Compliance Matters Contact		
Puc 2006.02(e)(2)	Name	Andrew Price
	Title	President & Chief Operating Officer
	Business Mailing Address	148 Middle St., Suite 500
		Portland, ME 04101
	Telephone Number	207-772-6190
E-Mail Address	aprice@competitive-energy.com	

Commission Assessment Payments Contact		
Puc 2006.02(e)(3)	Name	Lynn Gallagher
	Title	Controller
	Business Mailing Address	148 Middle St., Suite 500
		Portland, ME 04101
	Telephone Number	207-772-6190
E-Mail Address	lgallagher@competitive-energy.com	

Separate Attachments: Business Authority and Trade Name	
Puc 2006.02(f) Please see Exhibit 1.	Provide, as a separate attachment, evidence of the applicant's authorization to do business in New Hampshire from the New Hampshire secretary of state by submitting either of the following: (1) a recent printout of the applicant's listing on the N.H. Secretary of State website with the status "In Good Standing" or words of similar import; or (2) a copy of a certificate from the N.H. Secretary of State's office stating that the applicant is authorized to do business in New Hampshire.
Puc 2006.02(g) N/A	Provide, as a separate attachment, evidence of the applicant's registration of the trade name, if any, to be used by the applicant in New Hampshire from the New Hampshire secretary of state by submitting either of the following: (1) a recent printout of the applicant's trade name on the N.H. Secretary of State website with the status "Active" and indicating that the trade name is owned by the applicant; or (2) a copy of a certificate from the N.H. Secretary of State's office indicating that the applicant has registered as doing business under the trade name.

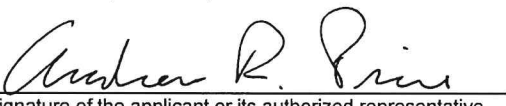


Statements Regarding Applicant and its Principals		
	Please respond to each of the following questions with either "Yes" or "No."	
Puc 2006.02(h)(1)	Has applicant or any of its principals ever been convicted of any felony that has not been annulled by a court?	NO
Puc 2006.02(h)(2)	Has applicant or any of its principals, within the 10 years immediately prior to application, had any civil, criminal, or regulatory sanctions or penalties imposed against it, him, or her pursuant to any state or federal consumer protection law or regulation?	NO
Puc 2006.02(h)(3)	Has applicant or any of its principals, within the 10 years immediately prior to application, settled any civil, criminal, or regulatory investigation or complaint involving any state or federal consumer protection law or regulation?	NO
Puc 2006.02(h)(4)	Is applicant or any of its principals currently the subject of any pending civil, criminal, or regulatory investigation or complaint involving any state or federal consumer protection law or regulation?	YES
Puc 2006.02(h)(5)	Has applicant or any of its principals been denied authorization to provide competitive electricity supply service or electric aggregation service in any other state or jurisdiction?	NO
	If an affirmative answer is provided to any item above, then provide a detailed explanation of the occurrence and the related circumstances. Use additional sheets as needed. Please see Exhibit 2.	

Other States		
Puc 2006.02(i)	Please list other states or jurisdictions in which the applicant currently conducts business relating to the aggregation of electric customers.	ME,MA,MD,RI, CT,NY,PA

Statement Regarding Supplier Representation		
Puc 2006.02(j)	Please respond to the following question with either "Yes" or "No." Is the applicant representing any supplier interest?	No
	If the response to the preceding question is "Yes," please list the supplier(s) represented. Use additional sheets if needed.	

Expected Marketing Start Date		
Puc 2006.02(k)	Provide the date upon which the applicant expects to commence marketing its services to customers in New Hampshire.	_____
	Renewal - Currently Licensed and doing business in NH.	Date

Attestation and Signature		
Puc 2006.02(l) and (m)	BY SIGNING BELOW, THE APPLICANT REPRESENTATIVE CERTIFIES THAT IT HAS THE AUTHORITY TO FILE THE APPLICATION ON BEHALF OF THE AGGREGATOR AND ATTESTS THAT THE CONTENTS OF THE APPLICATION ARE TRUTHFUL, ACCURATE, AND COMPLETE.  Signature of the applicant or its authorized representative Name: Andrew Price Title: President & COO	8/28/2019 Date

Filing Instructions		
	1) Mail an original and two paper copies of this form and all separate attachments to: Executive Director, NHPUC, 21 South Fruit St., Suite 10, Concord, NH 03301 2) E-mail a PDF of this form and all separate attachments to: Executive.Director@puc.nh.gov	

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Business Information

Business Details

Business Name: COMPETITIVE ENERGY SERVICES, LLC	Business ID: 388645
Business Type: Foreign Limited Liability Company	Business Status: Good Standing
Business Creation Date: 12/24/2001	Name in State of Formation: COMPETITIVE ENERGY SERVICES, LLC
Date of Formation in Jurisdiction: 12/24/2001	
Principal Office Address: 148 MIDDLE ST, PORTLAND, ME, 04101, USA	Mailing Address: 148 Middle St Suite 506, Portland, ME, 04101, USA
Citizenship / State of Formation: Foreign/Maine	
	Last Annual Report Year: 2019
	Next Report Year: 2020
Duration: Perpetual	
Business Email: Lgallagher@competitive-energy.com	Phone #: 207-772-6190
Notification Email: Lgallagher@competitive-energy.com	Fiscal Year End Date: NONE

Principal Purpose

S.No	NAICS Code	NAICS Subcode
1	OTHER / SERVICES RELATED TO AGGREGATE ELECTRICITY USERS	

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Principals Information

Name/Title	Business Address
Richard Silkman / Member	15 King Street, Scarborough, ME, 04074, USA
Andrew Price / President	148 Middle Street, Suite 500, Portland, ME, 04101, USA

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Registered Agent Information

Name: Leeming, Simon C, Esq

Registered Office Address: 57 N Main Street, Concord, NH, 03301, USA

Registered Mailing Address: 57 N Main Street, Concord, NH, 03301, USA

Trade Name Information

No Trade Name(s) associated to this business.

Trade Name Owned By

No Records to View.

Trademark Information

Trademark Number	Trademark Name	Business Address	Mailing Address
No records to view.			

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NH Department of State, 107 North Main St. Room 204, Concord, NH 03301 -- [Contact Us \(/online/Home/ContactUS\)](#)

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Competitive Energy Services Company Statement Concerning FERC

The Federal Energy Regulatory Commission (“FERC”) federal action is simply a repeat of its prior allegations. No court has ever ruled on those allegations, and CES and Dr. Richard Silkman categorically deny FERC’s allegations.

CES and Dr. Silkman are pleased that in April 2016 the federal court in Massachusetts granted their motion to transfer this case to Maine, where a federal court for the first time will evaluate the evidence. Because the Massachusetts court had to assume that FERC’s allegations were true, it denied their motion to dismiss. CES and Dr. Silkman are confident, however, that now that they are finally able to confront FERC’s evidence, and that the federal court in Maine now will finally examine all of the facts, it will conclude that CES and Dr. Silkman did nothing wrong. After six years of a secret FERC investigation in which FERC denied CES and Dr. Silkman the opportunity to confront FERC or cross-examine witnesses, and then after over two years of limbo in Massachusetts federal court, CES and Dr. Silkman will finally get their day in court in Maine.

In 2007, CES and Dr. Silkman provided advice to Rumford Paper Company on its participation in the ISO-New England’s flawed Day Ahead Load Response Program. In 2008, after concluding that the Day Ahead Program was fundamentally flawed, FERC cancelled the program. In an effort to shift blame for the flaws in the program, FERC conducted a nearly five-year investigation of participants in the program, including Rumford, Lincoln Pulp & Paper, and perhaps others, as well as CES and Dr. Silkman. FERC never granted CES and Dr. Silkman a hearing and never allowed them to cross-examine witnesses or review FERC’s evidence. CES and Dr. Silkman categorically deny that they engaged in market manipulation in advising Rumford Paper on its participation in this flawed program.

Some additional background details:

- FERC does not, and cannot, claim that CES and Dr. Silkman violated any regulations relating to the Day Ahead Program.
- All of the actions to date have been taken by FERC, an entity whose staff and leadership have an obvious bias given their responsibility for the flawed and, by FERC order, repealed Day-Ahead Load Response Program which is central to this issue and in which both Rumford and Lincoln mills participated along with dozens of others throughout New England.
- FERC is also targeting Lincoln Paper & Tissue, another Maine company with which CES and Dr. Silkman have never worked. The Rumford and Lincoln mills have been accused of a violation for participating in the program in the same manner as dozens of other participants and in full compliance with rules and program guidance.
- ISO-NE accepted the bids from Rumford Paper and numerous other participants. ISO-NE had access to minute-by-minute reports on participants’ historic and current power

consumption when it accepted these bids. Rumford Paper and all other participants stood ready to interrupt their consumption when called, but ISO-NE never made the request.

- CES and Dr. Silkman did everything possible to help Rumford Paper comply with a poorly designed program. The information, guidance and technical assistance that CES & Dr. Silkman provided to their client was entirely correct, complied with every rule and requirement of the program and was consistent with how numerous other participants around New England engaged in the DALRP.
- Rumford Paper settled this matter under the pressure of bankruptcy negotiations and in their settlement did not agree that any violation had occurred. They simply returned the money they had received from the program. FERC accepted this settlement.