<u>Integrys Energy Services Re-Registration Application to become a</u> Competitive Electric Power Supplier in the State of New Hampshire

- 1. The legal name of the applicant as well as any trade name(s) under which it intends to operate: Integrys Energy Services, Inc.
- 2. The applicant's business address, principal place of business, telephone number, facsimile number and email address: 1716 Lawrence Drive, DePere, WI 54115 Telephone: 920-617-6100 Facsimile: 920-617-6070 Email: customerservice@integrysenergy.com
- 3. The applicant's place of incorporation: Wisconsin, October 12, 1994
- 4. The names, titles, business addresses, telephone numbers and facsimile numbers of the applicant's principal officers: See Exhibit 1
- 5. A copy of the applicant's most recent financial statement: Integrys Energy Services is a wholly owned indirect subsidiary of Integrys Energy Group. Please see the attached Integrys Energy Group 2006 Annual Report, the most recent SEC 10Q Filing, and the credit ratings from Moody's Investors' Services and Standard and Poor's in Exhibit 2.
- 6. The following regarding any affiliate and/or subsidiary of the applicant:
 - a. The name and business address of the entity:
 - b. A description of the business purpose of the entity:

Integrys Energy Services has four wholly owned subsidiaries:

Quest Energy LLC 3520 Green Court, Suite 200 Ann Arbor, Michigan 48105

Business purpose: Retail and wholesale sales of electricity and natural gas.

Integrys Energy Services of New York, Inc.

3556 Lake Shore Road

Suite 420

Buffalo, NY 14219

Business purpose: Retail and wholesale sales of electricity and natural gas.

WPS Power Development, LLC

1716 Lawrence Drive

DePere, WI 54115

Business purpose: Development of power generation facilities.

Integrys Energy Services of Canada Corp with its principal office at 1716 Lawrence Drive, DePere, WI 54115 and satellite offices in Québec, Ontario and Alberta. Business purpose: Retail and wholesale sales of electricity and natural gas.

Integrys Energy Services of Canada Corp. satellite offices: Integrys Energy Services of Canada Corp. 375 boul. Roland-Therrien; bureau 230 Longueuil, Québec J4H 4A6

Integrys Energy Services of Canada Corp. 7th Floor; 90 Sheppard Avenue East Toronto, Ontario M2N 6X3

Integrys Energy Services of Canada Corp. 850, 639 5th Avenue, S.W Calgary, Alberta T2P 0M9

- c. Regarding any agreements with any affiliated New Hampshire jurisdictional electric distribution company, a description of the nature of the agreement: Integrys Energy Services has EDI trading partner and supplier service agreements as part of our registration with Unitil, Granite State, and PSNH. Integrys Energy Services affiliates do not currently have any agreements with any affiliated New Hampshire jurisdictional electric distribution company.
- 7. The toll free telephone number of the customer service department or the name, title and toll free telephone number of the customer service contact person: No change 1-888-288-0218 available 24 hours, 7 days
- 8. Name, title, business address, telephone number, facsimile number and email address of the individual responsible for responding to commission inquiries: For Complaints: Wanda Miller, Customer Interest Account Manager, 1750 Elm Street, Suite 402 Manchester, NH 03104 Telephone: (603) 263-6906 Facsimile: (603) 263-6999 Email: WJMiller@integrysenergy.com

For Regulatory: Amy Klaviter, Regulatory Compliance Coordinator, 500 W. Madison Street, Suite 3300 Chicago, IL 60661 Telephone: (312) 681-1855 Facsimile: (312) 681-1999, Email: aklaviter@integrysenergy.com

- 9. Name, title, business address and telephone number of the applicant's registered agent in New Hampshire for service of process: CT Corporation System, R. Carl Anderson, Attorney, 9 Capitol Street Concord, NH 03301 Telephone: 603-224-2341
- 10. A copy of the applicant's authorization to do business in New Hampshire from the New Hampshire secretary of state: See Exhibit 3

- 11. Description of geographic areas of New Hampshire in which the applicant intends to provide service, described by:
 - a. A distribution company's existing franchise area

No change:

Unitil (Unitil Corporation)

Granite State (Nat'l Grid utility)

PSNH (Northeast Utilities)

- b. Existing town boundaries, or
- c. A map with the boundary limits delineated
- 12. A description of the types of customers the applicant intends to serve, and the customer classes as identified in the applicable utility's tariff within which those customers are served:

No change:

Public Service of New Hampshire: Rates G - General Service,

GV - Commercial and Industrial

LG - Commercial and Industrial Service

<u>Unitil:</u> G1 Standard General Service Rate - Large Customer

G2 Standard General Service Rate - Small to Medium Customers

National Grid: General Service G-3

Time of Use G-1

Long Hour Service G-2

13. A listing disclosing the number and type of customer complaints concerning the applicant or its principals, if any, filed with a state licensing/registration agency, attorney general's office or other governmental consumer protection agency for the most recent calendar year in every state in which the applicant has conducted business relating to the sale of electricity:

Michigan in 2007 = 8 Complaints - enrollment timing/status and termination status questions

Maine in 2007 = 0 Complaints

District of Columbia in 2007 = 0 Complaints

Pennsylvania in 2007 = 0 Complaints

Maryland in 2007 = 0 Complaints

Delaware in 2007 = 0 Complaints

New Jersey in 2007 = 0 Complaints

Rhode Island in 2007 = 0 Complaints

Massachusetts in 2007 = 0 Complaints

New Hampshire in 2007 = 0 Complaints

Connecticut in 2007 = 1 Complaints - enrollment timing/status question

Ohio in 2007 = 10 Complaints – enrollment timing/status, renewal pricing, door-to-door sales clarification and collection questions.

Texas (licensed under Integrys Energy Services of Texas) in 2007 = 0 Complaints

New York (Licensed under Integrys Energy Services of New York) in 2007 = 0 Complaints

Illinois in 2007 = 27 Complaints - enrollment timing/status, termination status, pricing clarification questions

- 14. A statement as to whether any of the applicant's principals, as listed in a. through c. below, have ever been convicted of any felony that has not been annulled by a court:
 - a. For partnerships, any of the general partners
 - b. For corporations, any of the officers or directors, or
 - c. For limited liability companies, any of the managers or members
 No change None of the principals of Integrys Energy Services or its
 subsidiaries have ever been convicted of any felony that has not been annulled
 by a court.
- 15. A statement as to whether the applicant or any of the persons listed in (14) above has, within the 10 years immediately prior to registration:
 - a. Had any civil, criminal or regulatory sanctions or penalties imposed against them pursuant to any state or federal consumer protection law or regulation

No change - Integrys Energy Services, its affiliates, and any officers or directors of Integrys Energy Services or its subsidiaries have not had any civil, criminal, or regulatory sanctions or penalties imposed against them pursuant to any state or federal consumer law or regulation within the 10 years prior to this registration.

b. Settled any civil, criminal or regulatory investigation or complaint involving any state or federal consumer protection law or regulation; or

No change - Integrys Energy Services, its affiliates, and any officers or directors of Integrys Energy Services or its subsidiaries have not settled any civil, criminal, or regulatory investigation or complaint involving any state or federal consumer protection law or regulation within the 10 years prior to this registration.

c. Is currently the subject of any pending civil, criminal or regulatory investigation or complaint involving any state or federal consumer protection law or regulation

No change - Integrys Energy Services, its affiliates, and any officers or directors of Integrys Energy Services or its subsidiaries are not currently the subject of any pending civil, criminal, or regulatory investigation or complaint involving any state or federal consumer protection law or regulation.

16. If an affirmative answer is given to any item in (14) or (15) above, an explanation of the event: N/A

- 17. For those applicants intending to telemarket, a statement that the applicant shall:
 - a. Maintain a list of consumers who request being placed on a do-not-call list for the purposes of telemarketing;
 - b. Obtain, no less than semi-annually, access to updated telephone preference services list maintained by the Direct Marketing Association; and
 - c. Not initiate calls to New Hampshire customers who have either requested being placed on do-not-call lists or customers who are listed on the Direct Marketing Association's telephone preference lists

Integrys Energy Services maintains a list of consumers who have requested to be placed on a do-no-call list for the purposes of telemarketing. Integrys Energy Services also obtains, no less than semi-annually, access to updated telephone preference services listed by the Direct Marketing Association. Integrys Energy Services will not initiate calls to New Hampshire customers who have either requested being placed on the do-not-call lists or customers who are listed on the Direct Marketing Associations' telephone preference lists.

- 18. For those applicants that intend not to telemarket, a statement to that effect shall be provided; N/A
- 19. A sample of the bill form(s) that the applicant intends to use or a statement that the applicant intends to use the transmission/distribution company's billing service Integrys Energy Services uses the consolidated billing service of the local utility as well as direct billing to customers. See Exhibit 4 for the sample invoice sent to customers via direct billing.
- 20. A copy of each contract to be used for residential and small commercial customers See Exhibit 5- a sample contract to be used for both residential and small commercial customers. Any changes to this contract will be submitted to the commission within 30 days of the effective date of the change.
- 21. A statement certifying that the applicant has the authority to file the applications on behalf of the CEPS and that its contents are truthful, accurate and complete. This statement will be sent separately as an officer is not currently available to certify the statement.
- 22. Demonstration of technical ability to provide for the efficient and reliable transfer of data and electronic information between regulated distribution companies and CEPS in the form of:
 - a. A statement from each electric distribution company with which the CEPS intends to do business indicating that the applicant has complied with the training and testing requirements for electronic data interchange; and

- b. A statement from each electric distribution company with which the CEPS intends to do business indicating that the applicant has successfully demonstrated electronic transaction capability See Exhibit 6.
- 23. Evidence, including but not limited to proof of membership in the New England Power Pool (NEPOOL) or any successor organization or documentation of a contractual sponsorship relationship with a NEPOOL member, that the CEPS is able to obtain supply in the New England energy market: See Exhibit 7.
- 24. A \$250 re-registration fee: Enclosed
- **25. Evidence of financial security, as follows:** Henry Bergeron has recently received a guaranty.
 - a. The security shall be in the form of a surety bond or other financial instrument showing evidence of liquid funds, such as a certificate of deposit, an irrevocable letter of credit, a line of credit, a loan or a guarantee;
 - b. The security amount shall:
 - 1. Be the greater of:
 - i. \$100,000; or
 - ii. 20% of the CEPS estimated gross receipts for its first full year of operation, not including revenue from the provision of transition or default services; and
 - 2. Not exceed \$350,000; and
 - c. The security shall name the commission as obligee
- 26. The CEPS shall notify any transmission and distribution utility doing business in an area where the CEPS intends to compete of its registration application at the time it files such application with the commission and confirm with the transmission and distribution utility that it has successfully completed its registration.

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