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**Via regular mail and e-mail**

June 27, 2012

Patrick Clouden  
CEO, President, Secretary and Treasurer  
Consumer Energy Solutions, Inc.  
1255 Cleveland Street  
Clearwater, FL 33755

Re: DM 12-175 Consumer Energy Solutions, Inc.  
Natural Gas Aggregator Registration Application



Dear Mr. Clouden:

The Consumer Energy Solutions, Inc. (CES) application for renewal registration was received on June 25, 2012 and reviewed by Staff of the New Hampshire Public Utilities Commission (Commission) on the following day. After its preliminary review, Staff notes the application form submitted by CES uses an invalid, unauthorized form that references Puc 3003.02, the renewal requirements for competitive natural gas suppliers. The correct registration requirements for gas aggregator renewal registration are in section Puc 3003.05, and the proper renewal registration form is located in section Puc 3006.02. As a result of not using these correct sections of the Commission rules, CES included an over-payment of the renewal fee in its applications. By using the incorrect application form, there are a few mismatches, omissions and unnecessary additions of information, resulting in an application that is not in compliance with current requirements.

CES should refer to the instruction sheet and checklist on "how to register" that is available on the Commission web page and re-file its renewal application using the current registration form and requirements. Staff provides one clarification related to a reference in your cover letter, presents a resolution to the renewal fee over-payment and notes two of the more significant discrepancies in the registration application that should be administratively straightforward to correct.

In your cover letter you referenced that Bob Wyatt "discovered" that the current term was for two years and set to expire on June 27, 2012. Mr. Wyatt contacted CES when its renewal registration became overdue and learned of some misunderstanding regarding Commission registration requirements. The misunderstanding relates to revised Puc 3000 rules that became effective on September 25, 2010. To clarify, aggregator renewal registrations approved after that date are for a term of five years. The current registration for CES was approved prior to that date, under the old rules, thus the registration term was effective for two years. Staff considers this misunderstanding to be a minor administrative issue and not a problem for this renewal application.

As for the over-payment, Puc 3003.05(c) specifies the requirement for gas aggregator applications for renewal to provide a renewal fee of \$125. There is a similar renewal fee for electric power aggregator renewals. CES included a fee amount of \$500 for both its gas and electric power aggregator renewal applications. Staff will ask the Commission's Business Office to initiate a request for

refund of the over-payment and instruct that a check payable to CES for the full amount of the over-payment be mailed to CES.

The first discrepancy is an incorrect, or otherwise unclear response to 3006.02(a)(6) of the application. The requirement in Part (6) is to include a list of the Competitive Natural Gas Suppliers through which the applicant intends to provide service. The application form submitted by CES does not correctly identify this requirement, and the response that does not clearly address the requirement.

The second discrepancy is in Part (7) of the application. This requirement is for the applicant to provide a statement that it is not representing any supplier interest, or a listing of any supplier interest(s) the applicant intends to represent. The response from CES included a listing of five entities it intended to represent. Except for Glacial Energy, none of the other four supplier entities listed in the gas application are registered by the Commission as Competitive Natural Gas Suppliers in New Hampshire. As such, CES should not be representing the interests of these unregistered gas supplier entities.

In order to complete the registration process, please re-file the gas aggregator application pursuant to the requirements of Puc 3003.05, referencing the updated application and this docket number (DM 12-175) in your cover letter. Also be sure to use form Puc 3006.02, being careful to provide only what is required. As noted above, pay close attention to Parts (6) and (7) of application to correct the two discrepancies in the original application. Please feel free to contact me at (603) 271-2434 if you have any questions related to the registration requirements or to your registration application.

Sincerely,



Robert J. Wyatt  
Utility Analyst IV, Commission Staff

cc: Docket File