



September 20, 2011

Debra Howland
New Hampshire Public Utilities Commission
8 Old Suncook Road
Concord, NH 03301

Re: Notice of Name Change from Sprague Energy Corp. to Sprague Operating Resources LLC and Internal Restructuring

Dear Ms. Howland:

This letter concerns the change in name of Sprague Energy Corp. to Sprague Operating Resources LLC. Sprague Energy Corp. will be undergoing an internal restructuring in which it will be converting from a corporation to a limited liability company pursuant to Delaware corporate law; the name of the entity will be Sprague Operating Resources LLC, effective on or about the end of October. We are writing to provide notice to the department to request that the New Hampshire Public Utilities Commission modify Sprague's name of record on its Natural Gas license # DM 03-047.

Because Delaware law governing conversions from corporations to limited liability companies provides that all obligations, assets, rights and liabilities pass through to the new entity by operation of law, and because there are no "transfers" as a matter of law, it is our understanding that the conversion and name change do not require a new license or trigger license transfer obligations.

Can you please confirm in writing or by email, at your earliest convenience, that the department will modify the name of record to Sprague Operating Resources LLC its license and records? In the event that you have any questions, please call me directly at 603-430-5302. Thank you very much for your assistance on this matter.

Regards,

Katherine Battles
Senior Counsel

cc: Paul Scoff, Vice President, General Counsel