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August 9, 2011

James T. Rodier, Esq.
1500A Lafayette Road No. 112
Portsmouth, New Hampshire 03801-5918

Re: DM 11-103 - Freedom Logistics LLC
Trade Name - Municipal Energy Alliance

Dear Mr. Rodier:

On August 1, 2011, you filed a letter on behalf of Freedom Logistics LLC regarding its intent in operating under the trade name "Municipal Energy Alliance." This trade name is in addition to the current trade name of "Freedom Energy Logistics" used by Freedom Logistics LLC. In the letter, you requested that the Commission list "Municipal Energy Alliance" as a trade name for Freedom Logistics LLC on the Commission's website. Freedom Logistics LLC is registered as an aggregator of electric service in New Hampshire.

As you may recall, Staff met with you, Bart Fromuth and Howard Plante in May 2011 to discuss issues arising from the common management and addresses for a number of aggregators and competitive energy suppliers including Freedom Logistics, LLC, Resident Power Gas and Electric Solutions (Resident Power), PNE Energy Supply, and Halifax-American Operating Company. As you recall, Resident Power was first advertised as a "division" of Freedom Logistics, LLC. Staff advised that Resident Power would have to separately register as an aggregator to avoid confusion.

The proposed addition of Municipal Energy Alliance as a trade name for Freedom Logistics LLC creates the potential for confusion among customers. It also raises questions as to the relationship between "Municipal Energy Alliance" and Freedom Logistics LLC.

It is unclear from your letter whether this new trade name will be the exclusive trade name for Freedom Logistics LLC or if it will be used in addition to "Freedom Energy Logistics." Since "Municipal Energy Alliance" seeks to aggregate for municipal and governmental entities, it may be more appropriate to seek a separate registration as was done with Resident Power. Separate registration of Municipal Energy Alliance as

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an aggregator would provide more clarity to customers and avoid the confusion that Staff sees resulting from using multiple trade names.

As a reminder, entities that procure power only for affiliates must now register as competitive electric power suppliers under Puc 2000 rules. The exemption for affiliates was removed when the Commission readopted its rules last summer. Further, all competitive suppliers and aggregators are responsible for meeting the renewable portfolio standard requirements of RSA 362-F.

If you have any questions or would like to meet with Staff to discuss these issues, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Amanda O. Noonan". The signature is written in a cursive style with a long, sweeping tail on the final letter.

Amanda O. Noonan
Director, Consumer Affairs