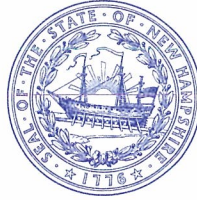


THE STATE OF NEW HAMPSHIRE

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Robert R. Scott
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EXECUTIVE DIRECTOR
Debra A. Howland



PUBLIC UTILITIES COMMISSION

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RECEIVED 18 FEB 16 PM 1:42

February 18, 2016

Chris Perrault, Chief Operating Officer
Ethical Electric, Inc.
1055 Thomas Jefferson St., Suite 650
Washington, DC 20007

Re: DM 16-237, Ethical Electric, Inc.
Competitive Electric Power Supplier Renewal Application
Deficiency Letter – Request for Additional Information

Dear Mr. Perrault:

On February 16, 2016, Ethical Electric, Inc. (Ethical Electric) submitted an application to the Commission for registration as a competitive electric power supplier (CEPS). Commission Staff has reviewed the application and determined it is incomplete and therefore does not comply with the requirements of N.H. Code Admin. Rules Puc 2003. In particular, Staff identified the following requirements that have not been met and the related items which are missing from the application:

- 1) Proof of completion of EDI testing with Eversource Energy (Eversource), Liberty Utilities (Liberty), and Unitil Energy Systems (UES).

Puc 2003.01(d)(1) Demonstration of technical ability to provide for the efficient and reliable transfer of data and electronic information between utilities and the CEPS in the form of:

(a) A statement from each utility with which the CEPS intends to do business indicating that the applicant has complied with the training and testing requirements for electronic data interchange.

(c) A statement from each utility with which the CEPS does or intends to do business indicating that the applicant has successfully demonstrated electronic transaction capability.

- 2) Proof of financial security.

Puc 2003.01(d)(4) Evidence of financial security, as defined in Puc 2003.03.

Regarding item #1, your application stated that Ethical Electric intends to provide service throughout New Hampshire. The application included a certificate that shows Ethical Electric has completed EDI testing with New Hampshire Electric Cooperative, Inc. (NHEC), but did not include EDI certificates from Eversource, Liberty, and UES. Pursuant to Puc 2003.01(d)(1), you must demonstrate that Ethical Electric has completed EDI testing with Eversource, Liberty, and UES prior to providing service in each of those electric distribution company's franchise areas. As an alternative, Ethical Electric could amend its application by stating that it intends to serve only in the franchise area of NHEC, and that it does not intend to serve in the franchise areas of Eversource, Liberty, and UES.

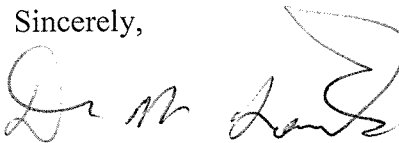
Regarding item #2, Ethical Electric's currently effective letter of credit (LOC) has a term that expires on July 16, 2016. Because the currently effective registration expires on April 15, 2016, and because Staff would not recommend renewal of the registration for a term of less than one year, if Ethical Electric intends to use the currently effective LOC, then the term of that LOC must be amended so that the expiration date is no earlier than April 15, 2017. In addition, if Ethical Electric intends to use a financial security instrument that has a term of less than five years and 90 days after the current renewal application was filed, it should file a request for a waiver of Puc 2003.03(5).

In order to complete your application, you should respond accordingly to the items listed above. When responding, please address your letter to Debra A. Howland, Executive Director, and reference the docket number listed on the subject line of this letter.

Pursuant to Puc 2003.04 (h), please provide all information requested within 60 days of the date of this letter, on or before **April 18, 2016**. Puc 2003.04 (h) is copied below.

Puc 2003.04(h) If the commission has requested information or clarification to complete an application for registration, and such information or clarification is not provided within 60 days of the request, the commission shall suspend the application. If, after 120 days of the date of the request, the applicant has not provided the requested information or clarification, the commission shall reject the application. If an application is rejected, the application fee shall be forfeited and the applicant shall be required to submit a new application and fee prior to acting as a CEPS in New Hampshire.

Sincerely,



David Goyette
Utility Analyst III

cc: Service List
Docket File

SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED

Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.

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Docket #: 16-237-1 Printed: February 18, 2016

FILING INSTRUCTIONS:

- a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:

DEBRA A HOWLAND
EXECUTIVE DIRECTOR
NHPUC
21 S. FRUIT ST, SUITE 10
CONCORD NH 03301-2429

- b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.
- c) Serve a written copy on each person on the service list not able to receive electronic mail.