



Glacial Energy of New England
24 Route 6A
Sandwich, MA 02563

November 3, 2010

New Hampshire Public Utilities Commission
Debra Howland, Executive Director
21 South Fruit Street, Suite 10
Concord, NH 03301-2429
(603) 271-2431



**RE: DM 08-108, Glacial Energy of New England, Inc.
Competitive Electric Service Provider Renewal – Request for Waivers**

Dear Ms. Howland,

Please accept this document as a formal request for two waivers in support of the renewal registration of Glacial Energy of New England, Inc. (“Glacial Energy”) as a CEPS in the state of New Hampshire, pursuant to NHPUC Rule 201.05.

The first waiver we seek is with regard to the timing of Glacial Energy’s renewal application, which was filed with the Commission on September 20, 2010. Our initial registration was effective September 9, 2008 and expired on or about September 9, 2010. It was our understanding that the revised PUC Rule 2000 adopted by the Commission on August 25, 2010 extended our original registration for an additional three-year period. Subsequently, however, Glacial Energy learned that its renewal registration was subject to the previous two-year rule. Therefore, we request a waiver of the requirement that Glacial Energy ordinarily would have filed its renewal application on or before September 9, 2010. Under the circumstances, we respectfully submit that our error was understandable and no stakeholder was harmed in any way by the slight tardiness of our renewal.

The second waiver requested is with regard to the letter of credit or other financial security that a CEPS is required to post with the Commission pursuant to the revised PUC Rule 2003.03.

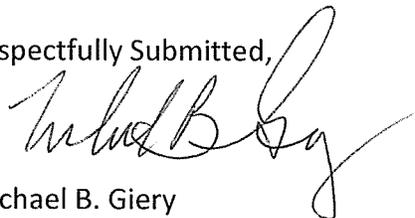
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The Rule states that such letter of credit must have an expiration date not less than five years and 90 days after the date the applicant's renewal application is filed. The letter of credit and Amendment thereto posted on behalf of Glacial Energy by Comerica Bank in the amount of \$350,000 is not structured in this manner. Rather than being issued for a five-year term, the letter of credit has an automatic renewal clause on an annual basis. Unless the bank gives 45 days' advance notice to the beneficiary (the Commission) of its cancellation, the letter of credit is automatically renewed on April 22 of each year. Comerica Bank has explained that this is a standard L/C format in the banking industry and it is the preferred format for all letters of credit issued by Comerica. Glacial Energy believes that the "evergreen" renewal term on its letter of credit sufficiently addresses the purpose of the Rule – namely, to ensure the financial security and integrity of Glacial Energy as a CEPS.

Glacial Energy submits that its proposed waiver requests both serve the public interest, and neither will disrupt the orderly and efficient resolution of matters before the Commission.

Thank you for your consideration of the two foregoing waiver requests. If you require any additional information, or have any questions, please contact me at (857) 222-0958.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Michael B. Giery". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Michael B. Giery
Senior Corporate Counsel