

STATE OF NEW HAMPSHIRE

Inter-Department Communication

DATE: August 2, 2011

AT (OFFICE): NHPUC

SEM

FROM: Al-Azad Iqbal
Utility Analyst III

SUBJECT: DM 11-147 Application of Devonshire Energy, LLC for Registration as a Competitive Electric Power Supplier (CEPS); Staff's Recommendation

TO: Debra A. Howland
Executive Director

On June 27, 2010, the New Hampshire Public Utilities Commission (Commission) received an application from Devonshire Energy, LLC (Devonshire) for its registration as a Competitive Electric Power Supplier (CEPS). In its application Devonshire requested waiver of Puc 2003.01(d)(4) and Puc 2003.03(a) regarding financial security. Devonshire argued that these waivers are not contrary to the public interest because the sole customers of Devonshire are its affiliates; the affiliate relationship eliminates any need for consumer protection in the form of a financial security, bill disclosure, or otherwise. Staff believes the explanations provided are reasonable and recommends that the Commission grant the waivers with following conditions:

1. Devonshire will not serve anyone other than its affiliates and subsidiaries listed in its application pursuant to Puc 2006.01(a)(5).
2. Neither its affiliates nor its subsidiaries would be involved in any activities covered under Puc 2000.
3. Devonshire must notify the Commission when it adds any new affiliates or subsidiaries.

Staff has reviewed Devonshire's application and believes that it meets all other requirements of Puc 2003.01. It is Staff's recommendation that Devonshire's application for its registration as a CEPS in New Hampshire be approved.

Should you have any questions, please do not hesitate to contact me.