

March 24, 2017

Via FedEx and Electronic Mail

New Hampshire Public Utilities Commission
Debra A. Howland
Executive Director
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

NHPUC 27MAR'17 4:53

Re: DM 17-042: Application of Champion Energy Services, LLC ("Champion") for its Initial Registration as a Competitive Electric Power Supplier

Dear Mrs. Howland:

Enclosed please find Champion's responses to Staff Commission's Request for Additional Information in its letter dated March 20, 2017. Specifically, included with this letter are the following:

- A screen print from NEPOOL's website that lists Champion as a member participant, labeled as **Exhibit 'A'** (Please note: Champion Energy Marketing, LLC ("CEM") is the listed Market Participant on the NEPOOL site. Champion is a subsidiary of CEM, which manages wholesale transactions and is the entity for which Champion's financials were reported at the time of registration. Per NEPOOL requirements, CEM would be the listed participant, as it had to match the financial documents.)
- A request for a waiver of the term requirement in Puc 2003.03(a)(5), labeled as **Exhibit 'B'**
- A list showing complaint counts by state and broken down by complaint type, labeled as **Exhibit 'C'**

Should you have any questions or concerns, please feel free to contact me at isabel.montalvo@championenergyservices.com or by phone at 281.653.0050.

Respectfully submitted,



Isabel Montalvo
Regulatory Affairs Analyst

Exhibit A:

Proof of NEPOOL Membership

Champion Energy Services, LLC

Exhibit A



NEW ENGLAND POWER POOL

Current Members

[HOME](#) [ABOUT NEPOOL](#) [PARTICIPANTS](#) [MEETINGS](#) [CALENDAR](#) [LIBRARY](#) [Current Issues](#) [NEPOOL GIS](#) [LINKS](#) [IMAPP](#)

Pre-Printed Rosters:

[Sector Roster](#)[Alphabetical \(by Voting Member\)](#)[Alphabetical \(2d RNA\)](#)[ISO-NE CAMS:](#)

Abest Power & Gas, LLC
Acadia Center
Acushnet Company
Asir Power Services LLC
Agera Energy LLC
Algonquin Energy Services Inc
Alphataraxia Nickel LLC
Ambit Northeast LLC
Ameresco CT LLC
American PowerNet Management, LP
AmericaWide Energy, LLC
Amersand Energy Partners LLC
Anbaric Management LLC
Anthony, Christopher M.
Antrim Wind Energy LLC
Archer Energy, LLC
Ashburnham Municipal Light Plant
Aspinity Energy, LLC
Associated Industries of Massachusetts
Astral Energy LLC
Athens Energy LLC
Atlantic Energy MA, LLC
Avangrid Renewables, LLC
Backyard Farms, LLC
Backyard Farms Energy, LLC
Bath Iron Works Corporation
BPPC LLC d/b/a Great Eastern Energy
Beacon Falls Energy Park, LLC
Bear Swamp Power Company LLC
Belmont Municipal Light Department
Berkshire Power Company, LLC
Berlin Station, LLC
Black Bear Hydro Partners, LLC
Blackstone Hydro, Inc.
Bloom Energy Corporation
Blue Sky East, LLC
Blue Sky West, LLC
BlueRock Energy, Inc.
BNP Paribas Energy Trading GP
Boston Energy Trading and Marketing
Boylston Municipal Light Department
BP Energy Company
Braintree Electric Light Department
Brayton Point Energy, LLC
Bridgewater Power Company L.P.
Brookfield Energy Marketing Inc.
Brookfield Energy Marketing LP
Brookfield Renewable Energy Mktg US
Brookfield White Pine Hydro LLC
Brown Bear II Hydro, Inc.
Buckport Generation LLC
Burlington Electric Department
C.N. Brown Electricity, LLC
Calpine Energy Services, LP
Calpine Energy Solutions, LLC
Canandaigua Power Partners, LLC
Cape Light Compact
Cargill Power Markets, LLC
Castleton Comm. Merchant Trading
Central Maine Power Company
Centre Lane Trading Limited
Champion Energy Marketing LLC
Champlain VT, LLC
Chester Municipal Light Department
CHI Power Marketing, Inc.
Chicopee Municipal Lighting Plant
Choice Energy LLC
Citigroup Energy Inc.
CleanChoice Energy, Inc.
Clear Choice Energy, LLC
CLEARresult Consulting Inc.
Clearview Electric Inc.
Commonwealth of Massachusetts
(Div. of Capital Assets Management)
Commonwealth Resource Management
Corporation
Competitive Energy Services, LLC
Concord Municipal Light Plant
Conn. Central Energy, LLC
Conn. Gas & Electric, Inc.
Conn. Jet Power LLC
Conn. Light and Power Company d/b/a
Eversource Energy
Conn. Materials Innovations & Recycling
Authority

Danvers Electric Division
Darby Energy, LLP
Dartmouth Power Associates, LP
DIC Energy, LLC
Deepwater Wind Block Island LLC
Devon Power LLC
Devonshire Energy LLC
DFC ERG CT, LLC
Direct Energy Business, LLC
Direct Energy Business Marketing, LLC
Discount Power, Inc.
Dominion Energy Marketing, Inc.
Dominion Nuclear Connecticut, Inc.
DTE Energy Trading, Inc.
Dynasty Power Inc.
Dynevig Marketing and Trade LLC
East Avenue Energy LLC
EDF Energy Services, LLC
EDF Trading North America, LLC
eCapital Investments LLC
Electricity Maine, LLC
Electricity N.H., LLC d/b/a ENH Power
Electrolia, Inc.
Eligo Energy, LLC
Emera Energy Services Sub. No. 1 LLC
Emera Energy Services Sub. No. 2 LLC
Emera Energy Services Sub. No. 3 LLC
Emera Energy Services Sub. No. 4 LLC
Emera Energy Services Sub. No. 5 LLC
Emera Energy Services Sub. No. 6 LLC
Emera Energy Services Sub. No. 7 LLC
Emera Energy Services Sub. No. 8 LLC
Emera Energy Services Sub. No. 9 LLC
Emera Energy Services Sub. No. 10 LLC
Emera Energy Services Sub. No. 11 LLC
Emera Energy Services Sub. No. 12 LLC
Emera Energy Services Sub. No. 13 LLC
Emera Energy Services Sub. No. 14 LLC
Emera Energy Services Sub. No. 15 LLC
Emera Maine Inc.
EmpireCo Limited Partnership
Energy Management, Inc.
Energy New England LLC
Energy Federation Inc.
Energy GPS LLC
Energy Plus Holdings LLC
EnerNOC, Inc.
Enerwise Global Technologies, Inc.
d/b/a CPower
Engelhart CTP (US) LLC
ENGIE Resources LLC
Energy Nuclear Power Marketing LLC
Entrust Energy East, Inc.
EnviaPower, Inc.
Epicco USA, Inc.
ESI Northeast Energy GP, Inc. Essential
Power, LLC
Essential Power Massachusetts, LLC
Essential Power Newington, LLC
ETC Endure Energy, LLC
Evergreen Wind Power II, LLC
Evergreen Wind Power III, LLC
EverPower Commercial Services LLC
Eversource Energy Transmission
Ventures, Inc.
Everyday Energy, LLC
Exelon Generation Company, LLC
Fairchild Energy, LLC
Fairpoint Energy, LLC
Farhad Aminpour
First Point Power, LLC
First Wind Energy Marketing, LLC
Firstlight Power Resources
Management, LLC
Fisher Road Solar LLC
Fitchburg Gas and Electric Light Co.
Food City, Inc.
Footprint Power Salem Harbor
Development
FPL Energy Mason, LLC
FPL Energy Wyman, LLC
FPL Energy Wyman IV, LLC
Freepoint Commodities, LLC
Galt Power Inc.
Garland Manufacturing Company

H.Q. Energy Services (U.S.) Inc.
Hammond Belgrade Energy LLC
Hammond Lumber Company
Hampshire Council of Governments
Hancock Wind, LLC
Hanover, NH (Town of)
Harborside Energy of Massachusetts
Harvard Dedicated Energy Limited
Hess Corporation
High Liner Foods (USA) Incorporated
Hiko Energy, LLC
Hingham Municipal Lighting Plant
Holden Municipal Light Department
Holyoke Gas & Electric Department
Howard Wind LLC
Hudson Energy Services, LLC
Hudson Light and Power Department
Hull Municipal Lighting Plant
Icetec Energy Services, Inc.
IDT Energy, LLC
Indeck Energy-Alexandria, LLC
Independence Energy Group LLC
Industrial Energy Consumer Group
Industrial Power Services Corporation
Inertia Power III LP
Inspire Energy Holdings, Inc.
Interstate Gas Supply, Inc.
Invenergy Energy Management LLC
Ipswich Municipal Light Department
J. Aron & Company
J.F. Gray & Associates, LLC
Jericho Power LLC
Just Energy (U.S.) Corp.
Kendall Green Energy LLC
Kimberly-Clark Corporation
King Forest Industries, Inc.
Kleen Energy Systems, LLC
Liberty Power Delaware LLC
Liberty Power Holdings, LLC
Liberty Utilities (Granite State Electric)
LifeEnergy, LLC
Linde Energy Services, Inc.
Littleton (MA) Electric Light Dept
Littleton (NH) Water and Light Dept
Long Island Lighting Co. d/b/a LIPA
Longfellow Wind, LLC
Longreach Energy, LLC
Longwood Medical Energy
Collaborative, Inc.
Lotus Danbury LMS100 One, LLC
Lotus Danbury LMS100 Two, LLC
MA Operating Holdings, LLC
Macquarie Energy, LLC
Madison Electric Works
MAG Energy Solutions, Inc.
Maine Power LLC
Maine Public Advocate Office
Maine Skiing, Inc.
Major Energy Electric Services
Manchester Methane, LLC
Mansfield Municipal Electric Dept
Marble River, LLC
Marblehead Municipal Light Dept
Mass Solar 1, LLC
Mass. Office of the Attorney General
Mass. Bay Transportation Authority
Mass. Development Finance Agency
Mass. Electric Company
Mass. Gas and Electric, Inc.
Mass. Municipal Wholesale Electric Co.
Mass. Port Authority
MATEP LLC
McGill-St-Laurent Inc.
Mega Energy Holdings, LLC
Mencura Energy America, Inc.
Merrill Lynch Commodities, Inc.
Merrimack Municipal Light Department
Messalonskee Stream Hydro, LLC
Mid-Maine Waste Action Corporation
Middleborough Gas and Electric Dept
Middleton Municipal Electric Dept
Middletown Power LLC
Millennium Power Partners, LP
Mint Energy, LLC
Monville Power LLC

Nakor Energy Marketing
Narragansett Electric Company
National Gas & Electric, LLC
NEPM II, LLC
New Brunswick Energy Mktg. Corp.
New England Confectionery Co. Inc.
New England Energy Connection, LLC
New England Power Company
New England Wire Technologies Corp.
New Hampshire Electric Coop., Inc.
New Hampshire Industries, Inc.
NH Office of Consumer Advocate
New Hampshire Transmission, LLC
New York State Electric & Gas, Inc.
NextEra Energy Marketing, LLC
NextEra Energy Maine, Inc.
NextEra Energy Resources, LLC
NextEra Energy Seabrook LLC
Niagara Wind Power, LLC
Noble Americas Gas & Power Corp.
Noble Environmental Power, LLC
Nordic Energy Services, LLC
North America Power Partners LLC
North American Power and Gas, LLC
North Attleborough Electric Dept
Northern States Power Company
Norwalk Power LLC
Norwood Municipal Light Department
NRG Canal LLC
NRG Curtailment Solutions, Inc.
NRG Power Marketing, LLC
NSTAR Electric Company d/b/a
Eversource Energy
NTE Connecticut, LLC
Number Nine Wind Farm LLC
Oasis Power, LLC d/b/a Oasis Energy
Ontario Power Gen. Energy Trading
Ontario Power Generation Inc.
Pacific Summit Energy, LLC
Palmetto Power CT, LLC
Palmetto Power MA, LLC
Parkview Adventist Medical Center
Pascoag Utility District
Patriot Partnership LLC
Pawtucket Power Holding Company
Paxton Municipal Light Department
Peabody Municipal Light Plant
Peninsula Power, LLC
Pergees Energy, LLC
Pioneer Hydro Electric Co., Inc.
Plainfield Renewable Energy, LLC
Plant-E Corp.
Plymouth Rock Energy, LLC
PNE Energy Supply LLC
Power Bidding Strategies, LLC
Power Supply Services, LLC
PowerOptions, Inc.
Praxair, Inc.
Princeton Municipal Light Department
Provider Power Mass, LLC
PSEG Energy Resources & Trade LLC
PSEG New Haven LLC
Public Power, LLC
Public Service Co. of New Hampshire
d/b/a Eversource Energy
Putnam Hydropower, Inc.
Rainbow Energy Marketing
Corporation
RBC Energy Services LP
Reading Municipal Light Plant
Record Hill Wind LLC
ReEnergy Stratton Energy LLC
Reliant Energy Northeast LLC
REP Energy LLC
Resipal Energy North American Corp.
Residents Energy, LLC
Rhode Island Engine Genco, LLC
Rhode Island State Engine Center, LP
Rocky Gorge Corporation
Rocport Investments Inc.
Rowley Municipal Light Plant
Royal Bank of Canada
Russell Municipal Light Department

Saint Anselm College
Saracen Energy East LLC
Saracen Power LLC
Seneca Energy II, LLC
SFE Energy Connecticut LLC
SFE Energy Massachusetts LLC
Shell Energy North America (US) L.P.
Shipley Choice, LLC
d/b/a Shipley Energy
Shipyards Brewing Co., LLC
Shipyard Energy LLC
Shrewsbury Electric & Cable Operations
SmartEnergy Holdings LLC
Solea Energy, LLC
Somerset Power LLC
South Hadley Electric Light Department
South Jersey Energy Company
South Jersey Energy ISO 1, LLC
Spark Energy, LP
Springfield Power LLC
Spruce Mountain Wind, LLC
SRECTrade, Inc.
Starling Energy, Inc.
Sterling Municipal Electric Light Dept
Stetson Holdings, LLC
Stetson Wind II, LLC
Stowed Solar J&WE, LLC
Stowe Electric Department
Sunwave USA Holdings, Inc.
Sustaining Power Solutions LLC
SWEB Development USA, LLC
Swift River Trading Company LLC
Talen Energy Marketing, Inc.
Tangent Energy Solutions, Inc.
Taunton Municipal Lighting Plant
TCPL Power Ltd.
TEC Energy, Inc.
Templeton Municipal Lighting Plant
Tenaska Power Services Co.
Texas Retail Energy, LLC
The Energy Consortium
The Energy Council of Rhode Island
Titan Gas LLC
Town of New Shoreham, Rhode Island
Town Square Energy, LLC
TrailStone Power, LLC
TransAlta Energy Marketing (U.S.) Inc.
TransCanada Energy Ltd.
TransCanada Power Marketing Ltd.
Twin Eagle Resource Co.
UIL Distributed Resources, LLC
Unica Energy, LP - Series G
Union Atlantic Electricity, Inc.
Union Leader Corporation
Union of Concerned Scientists, Inc.
Uniper Global Commodities North
America LLC
United Illuminating Company
Unitil Energy Systems, Inc.
UNTIL Power Corp.
University of Massachusetts at Amherst
University System of New Hampshire
Utility Expense Reduction LLC
Utility Services, Inc.
VCharge Inc.
Verde Energy USA, Inc.
Vermont Electric Cooperative
Vermont Electric Power Company, Inc.
Vermont Energy Investment Corp.
Vermont Public Power Supply Authority
Vermont Transco LLC
Vermont Wind
Verso Energy Services, LLC
Viridian Energy, LLC
Viridity Energy, Inc.
Virid Inc.
Wakefield Municipal Gas and Light Dept
Wallingford, CT, DPV, Electric Division
Wallingford Energy II, LLC
Waterbury Generation LLC
Waterside Power, LLC
Wellesley Municipal Light Plant
West Boylston Municipal Lighting Plant
Western Massachusetts Electric Co.
d/b/a Eversource Energy

Champion Energy Services, LLC

Exhibit A

Conn. Municipal Electric Energy Coop.
 Conn. Office of Consumer Counsel
 Conn. Transmission Municipal Electric
 Energy Coop.
 Conservation Law Foundation
 Consolidated Edison Co. of NY, Inc.
 Consolidated Edison Development, Inc.
 Consolidated Edison Energy, Inc.
 Consolidated Edison Solutions, Inc.
 Constellation Energy Power Choice, LLC
 Constellation Energy Services, Inc.
 Constellation NewEnergy, Inc.
 Convergent Energy and Power LLC
 Covanta Energy Marketing, LLC
 Covanta Haverhill Associates, LP
 Covanta Projects of Wallingford, LP
 CPV Towantic, LLC
 Cricket Valley Energy Center, LLC
 Cross-Sound Cable Company, LLC
 Cumulus Master Fund

Garland Power Company
 Gas Recovery Systems, LLC
 GBE Power Inc.
 GDF SUEZ Energy Marketing NA, Inc.
 GenBright, LLC
 GenCnn Energy LLC
 GenOn Energy Management, LLC
 Georgetown Municipal Light Dep't
 Goose River Hydro, Inc.
 Granite Reliable Power, LLC
 Granite Ridge Energy, LLC
 Gravity Renewables Inc.
 Great Bay Power Marketing, Inc.
 Green Berkshires, Inc.
 Green Development, LLC d/b/a Wind
 Energy Development, LLC
 Green Mountain Energy Company
 Green Mountain Power
 Green Power USA
 Groton Electric Light Department
 Groveland Electric Light Department

Moore Company, The
 Moore Energy LLC
 Morgan Stanley Capital Group, Inc.

Westfield Gas & Electric Light Dep't
 Wheelabrator Bridgeport, LP
 Wheelabrator North Andover, Inc.
 WM Renewable Energy, LLC
 Wolfeboro Municipal Electric Department
 Wolverine Holdings, L.P.
 XOOM Energy LLC
 Yes Energy, LLC
 Z-TECH, LLC

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Exhibit B:

Request for Waiver of Term Requirement

**Before the
STATE NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

In the Matter of the Application of	§	Docket No. DM 17-042
Champion Energy Services, LLC	§	
For Its Initial Registration	§	
As a Competitive Electric Power	§	
Supplier ("CEPS")	§	

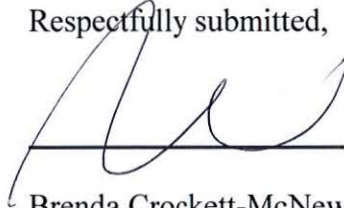
**CHAMPION ENERGY SERVICES, LLC'S REQUEST FOR WAIVER OF FIVE-YEAR
AND 150 DAY FINANCIAL SECURITY TERM**

On March 15, 2017 Champion Energy Services, LLC ("Champion") submitted an application to the Commission for registration as a CEPS. As part of Champion's application, Bond No. 800030681 was provided in the amount of \$100,000.00 and named the New Hampshire Public Utilities Commission as the obligee. Contrary to N.H. Code Admin. Rules, the bond filed had a term that is less than required.

Pursuant to Puc 201.05, Champion respectfully requests a Waiver of Rules as they pertain to Puc 2003.03(a)(5). Specifically, Puc 2003.03(a)(5) requires every CEPS to submit financial security with an expiration date of not less than five (5) years and 150 days after the date the application is filed. Champion respectfully requests to submit financial security with an expiration date of one (1) year after the date the application is filed. This waiver is necessary for Champion to secure financial security because the bonding company providing the surety bond will not issue a bond with an expiration of more than one (1) year from issuance. Champion proposes to renew its financial security annually and file a new bond prior to the expiration of the existing bond. In sum, as compliance would be onerous and potentially anti-competitive and

the proposed alternative method satisfies the purpose of Puc 2003.03(a), the Champion waiver proposal serves the public interest and should be granted. See Puc 201.05(a), (b).

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Brenda', is written over a solid horizontal line.

Brenda Crockett-McNew
Vice President, Market Development and
Regulatory Affairs

Exhibit C:

Customer Complaints



Customer Complaints for 2016

Complaint Class	NJ	OH	PA	TX	MA	IL	MD	NY
Rates and Charges	5	9	3	19		1		
Early Termination Fees	1	13	5				5	
Discontinuance	3	7	4			2		
Deceptive Sales Practice	1	1	2					
Sales Practice		1			2			
Changing Suppliers			1		1	2		
Competition Related Billing Dispute			9				3	1
Deceptive Advertising			1					
Slamming			7	35			3	
Terms and Conditions			1					
Cramming				1				
Customer Service				6				
No Bill Received				1		3		
Total (159)	10	31	33	62	3	8	11	1