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August 17, 2017

**VIA FED-EX and ELECTONIC FILING**

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

**Re: North American Power and Gas, LLC –  
CEPS Application for Renewal Registration DM 17-125  
Response to Request for Additional Information**

Dear Ms. Howland,

In response to Mr. David Goyette's August 7<sup>th</sup>, 2017 letter requesting additional information, please find enclosed North American Power and Gas, LLC's (NAPG) response to each item listed in the referenced letter.

**1. Proof of financial security**

As noted in NAPG's renewal registration submitted on August 3<sup>rd</sup>, 2017, the company intended to supplement its registration application to replace the security currently in effect and on file with the PUC. The notation followed email exchanges and a discussion with Mr. Goyette seeking staff's review and prior acceptance before actually filing the replacement security. NAPG appreciates staff's time, efforts and guidance on the various aspects of the renewal registration. As instructed by staff, please find enclosed as Attachment A the modified bond. As part of this supplemental filing, NAPG hereby requests that the enclosed financial security be used to replace the existing financial security. Upon acceptance of the replacement security, please return the old security instrument to my attention at: North American Power and Gas, LLC, 20 Glover Ave, 3r Fl., Norwalk, CT 06850.

**2. Proof of Completion of EDI training and testing with PSNH**

Please find enclosed NAPG's proof of completion of EDI training and testing with PSNH field as Attachment B.

**3. A listing, by state, of the number and type of customer complaints**

In its initial renewal registration application, pursuant to 2006.01(a)(13), NAPG provided a list of the type of complaints which listed the number of complaints in each category. The

data was compiled “for the most recent calendar year in every state where the applicant has conducted business relating to the sale of electricity”. Staff’s data request clarifies that the information needed is to separately identify the complaint records by each state in which the complaint allegations were filed. Enclosed as Attachment C is the updated chart.

Thank you for your assistance, please do not hesitate to contact me via email at [Kjoseph@napower.com](mailto:Kjoseph@napower.com) or by telephone at 203-663-9757.

Respectfully Submitted,

  
Keenia Joseph  
Director, Regulatory Affairs

Enclosures

cc: David Gayotte, PUC  
Donald Kreis, OCA

# Attachment A

FORM OF SURETY BOND

WITNESSETH: This Surety Bond given by **North American Power and Gas, LLC** as Principal, and **Atlantic Specialty Insurance**

**Company**, as Surety, are jointly and severally bound unto **New Hampshire Public Utilities Commission**, as Obligee, in the amount of **Three Hundred Fifty Thousand and NO/100 Dollars (\$350,000.00)** (U.S.), for the payment of which the Principal and Surety bind themselves, their heirs, executors, administrators, successors, assigns or other legal representatives.

WHEREAS, the Principal has filed an application with the New Hampshire Public Utilities Commission ("NHPUC" or "Obligee") seeking approval to operate as a Competitive Electric Power Supplier ("CEPS"); and

WHEREAS, NHPUC rules require that a CEPS must maintain and appropriate amount of financial security; and

WHEREAS, the Principal must post the Bond amount to cover its financial security obligation to the NHPUC; and

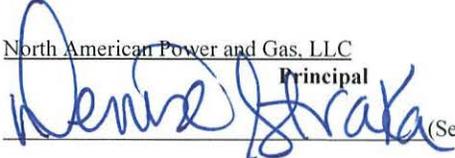
WHEREAS, the Bond amount may be subsequently increased or decreased pursuant to NHPUC rules;

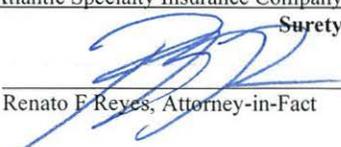
NOW, THEREFORE, Upon notice from Obligee of Principal's nonperformance of its duties as a New Hampshire CEPS, or Principal's fraud or other violations of the laws, rules, decisions and orders applicable to Principal's CEPS registration, Surety shall immediately pay to Obligee the amount specified by Obligee, not to exceed the amount of this Bond. This Bond shall remain in full force and effect for the term set forth below unless terminated as provided below.

This Bond is subject to the following terms, limitations and conditions:

1. The term of this bond shall be for five years and 90 days commencing on August 11th, 2017.
2. That no proceeding in law or in equity may be brought under this Bond unless the same shall be commenced and process served prior to the expiration of one (1) year from the date of termination of this Bond.

IN WITNESS THEREOF, said Principal and said Surety have caused these presents to be duly signed and sealed this **11th** day of **August, 2017**.

North American Power and Gas, LLC  
**Principal**  
 (Seal)

Atlantic Specialty Insurance Company  
**Surety**  
 (Seal)  
Renato F Reyes, Attorney-in-Fact

## CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

A Notary Public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

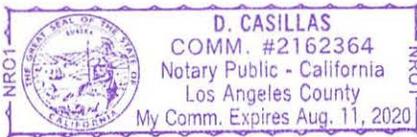
State of California

County of Los Angeles

On AUG 11 2017 before me, D. Casillas, Notary Public, personally appeared Renato F Reyes who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/~~are~~ subscribed to the within instrument and acknowledged to me that he/~~she/they~~ executed the same in his/~~her/their~~ authorized capacity(ies), and that by his/~~her/their~~ signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Signature   
Signature of Notary Public



# Power of Attorney

KNOW ALL MEN BY THESE PRESENTS, that ATLANTIC SPECIALTY INSURANCE COMPANY, a New York corporation with its principal office in Plymouth, Minnesota, does hereby constitute and appoint: **Edward C. Spector, Tracy Aston, Simone Gerhard, Thomas Branigan, Marina Tapia, Renato F Reyes, April Martinez**, each individually if there be more than one named, its true and lawful Attorney-in-Fact, to make, execute, seal and deliver, for and on its behalf as surety, any and all bonds, recognizances, contracts of indemnity, and all other writings obligatory in the nature thereof; provided that no bond or undertaking executed under this authority shall exceed in amount the sum of: **sixty million dollars (\$60,000,000)** and the execution of such bonds, recognizances, contracts of indemnity, and all other writings obligatory in the nature thereof in pursuance of these presents, shall be as binding upon said Company as if they had been fully signed by an authorized officer of the Company and sealed with the Company seal. This Power of Attorney is made and executed by authority of the following resolutions adopted by the Board of Directors of ATLANTIC SPECIALTY INSURANCE COMPANY on the twenty-fifth day of September, 2012:

Resolved: That the President, any Senior Vice President or Vice-President (each an "Authorized Officer") may execute for and in behalf of the Company any and all bonds, recognizances, contracts of indemnity, and all other writings obligatory in the nature thereof, and affix the seal of the Company thereto; and that the Authorized Officer may appoint and authorize an Attorney-in-Fact to execute on behalf of the Company any and all such instruments and to affix the Company seal thereto; and that the Authorized Officer may at any time remove any such Attorney-in-Fact and revoke all power and authority given to any such Attorney-in-Fact.

Resolved: That the Attorney-in-Fact may be given full power and authority to execute for and in the name and on behalf of the Company any and all bonds, recognizances, contracts of indemnity, and all other writings obligatory in the nature thereof, and any such instrument executed by any such Attorney-in-Fact shall be as binding upon the Company as if signed and sealed by an Authorized Officer and, further, the Attorney-in-Fact is hereby authorized to verify any affidavit required to be attached to bonds, recognizances, contracts of indemnity, and all other writings obligatory in the nature thereof.

This power of attorney is signed and sealed by facsimile under the authority of the following Resolution adopted by the Board of Directors of ATLANTIC SPECIALTY INSURANCE COMPANY on the twenty-fifth day of September, 2012:

Resolved: That the signature of an Authorized Officer, the signature of the Secretary or the Assistant Secretary, and the Company seal may be affixed by facsimile to any power of attorney or to any certificate relating thereto appointing an Attorney-in-Fact for purposes only of executing and sealing any bond, undertaking, recognizance or other written obligation in the nature thereof, and any such signature and seal where so used, being hereby adopted by the Company as the original signature of such officer and the original seal of the Company, to be valid and binding upon the Company with the same force and effect as though manually affixed.

IN WITNESS WHEREOF, ATLANTIC SPECIALTY INSURANCE COMPANY has caused these presents to be signed by an Authorized Officer and the seal of the Company to be affixed this eighth day of December, 2014.



By *Paul J. Brehm*  
Paul J. Brehm, Senior Vice President

STATE OF MINNESOTA  
HENNEPIN COUNTY

On this eighth day of December, 2014, before me personally came Paul J. Brehm, Senior Vice President of ATLANTIC SPECIALTY INSURANCE COMPANY, to me personally known to be the individual and officer described in and who executed the preceding instrument, and he acknowledged the execution of the same, and being by me duly sworn, that he is the said officer of the Company aforesaid, and that the seal affixed to the preceding instrument is the seal of said Company and that the said seal and the signature as such officer was duly affixed and subscribed to the said instrument by the authority and at the direction of the Company.



*Tara Janelle Stafford*  
Notary Public

I, the undersigned, Assistant Secretary of ATLANTIC SPECIALTY INSURANCE COMPANY, a New York Corporation, do hereby certify that the foregoing power of attorney is in full force and has not been revoked, and the resolutions set forth above are now in force.

Signed and sealed. Dated \_\_\_\_\_ day **AUG 11 2017**.

This Power of Attorney expires  
October 1, 2017



*James G. Jordan*  
James G. Jordan, Assistant Secretary

**Public Service of New Hampshire  
Certificate of Completion**

*is hereby granted to:*

**North American Power & Gas, LLC**

*to certify that they have completed to satisfaction*

**NH Supplier Training**



**Granted: 07/18/12**

*Aaron Downing*

Aaron Downing  
PSNH Supplier Services

## Attachment C

**2016 Summary of Complaint Types (By State)**

<u>State</u>	<u>Aggressive Sales Tactics</u>	<u>Billing Issue</u>	<u>Cancellation Delay</u>	<u>Deceptive Marketing</u>	<u>DNC/DNM</u>	<u>Enrollment Delay</u>	<u>Miscellaneous</u>	<u>Promotion Not Received</u>	<u>Quality of Service</u>	<u>Rate Issue</u>	<u>Renewal Letter Dispute</u>	<u>Requesting Cancellation</u>	<u>Unauthorized Switch</u>
Connecticut	0	1	4	5	3	0	1	1	0	9	2	3	4
Georgia	0	3	0	0	0	0	0	0	1	0	0	0	0
Illinois	0	0	0	0	0	0	0	0	1	2	1	1	5
Maine	0	0	1	1	0	0	0	0	0	0	0	6	1
Maryland	0	0	0	0	0	0	0	0	0	1	1	0	2
New Hampshire	0	2	3	2	4	0	0	1	0	4	9	6	8
New Jersey	0	1	0	0	0	0	0	0	0	2	0	1	3
New York	0	1	2	2	0	0	0	1	0	6	9	1	8
Ohio	2	0	5	7	1	4	1	0	0	11	8	1	13
Pennsylvania	2	5	2	1	1	0	0	1	1	7	14	2	34
Rhode Island	0	0	0	0	0	0	0	0	0	0	2	0	4
Texas	0	0	0	0	0	0	0	0	0	0	0	0	2

NAPG received the below complaint allegations for the most recent calendar year in every state in which it has conducted business relating to the sale of electricity.