

**STATE OF NEW HAMPSHIRE**

## Inter-Department Communication

**DATE:** September 25, 2017  
**AT (OFFICE):** NHPUC

  
**FROM:** David Goyette, Utility Analyst III

**SUBJECT:** DM 17-126, Town Square Energy, LLC  
Renewal of Registration as Competitive Electric Power Supplier

**TO:** Commissioners  
Debra Howland, Executive Director

Executive Summary

Town Square Energy has applied to renew its registration as a competitive electric power supplier. Town Square Energy's current registration expires on October 9, 2017. Town Square Energy submitted a sample residential and small commercial customer contract, certificates demonstrating it completed EDI testing with Eversource and Unitil, riders to its surety bond which extends the term by one year and increases the amount to \$350,000, and a request for a waiver of the five-year and 90-day term requirement for financial security. If the Commission were to grant the requested waiver, Staff believes the filing is acceptable. Staff recommends that the Commission grant the waiver and approve the application, for service in the franchise areas of Eversource and Unitil, for a renewal registration period ending on the termination date of the surety bond as extended.

Background and Analysis

On August 10, 2017, Town Square Energy, LLC (Town Square Energy) filed an application to renew its registration as a competitive electric power supplier (CEPS). Town Square Energy's currently active registration, which the Commission approved in Docket DM 16-801, expires on October 9, 2017. Town Square Energy's application included certificates demonstrating that it has completed electronic data interchange (EDI) testing with Public Service Company of New Hampshire d/b/a Eversource Energy (Eversource) and Unitil Energy Systems, Inc. (Unitil), and a residential and small commercial customer contract. On September 18, 2017, Town Square Energy filed a rider that increases the amount of its currently effective surety bond, from \$100,000 to \$350,000, and a request for a waiver of Puc 2003.03(a)(5), which requires that the financial security filed with a CEPS renewal application have a term of five years and 90 days. On September 22, 2017, Town Square Energy filed a corrected rider that extends the term of its currently effective surety bond to October 9, 2018.

Staff has reviewed the information in the application and, if the Commission were to grant approval of the waiver request of the financial security term requirement, believes it meets the requirements of Puc 2003 and 2006.01. Staff recommends that the

Commission grant the request for a waiver and, because the surety bond does not meet the five-year and 90-day term requirement and because it expires on October 9, 2018, that the Commission approve a registration period concurrent with the term of the surety bond, beginning on the expiration date of the currently active registration, October 9, 2017, and ending at the close of business on October 8, 2018. Staff also recommends that the Commission notify Town Square Energy that revised rules for CEPS, adopted on August 25, 2017 and effective on November 1, 2017, contain financial security and other requirements different from those in the currently effective rules and that Town Square Energy should plan accordingly with respect to future operations in New Hampshire.

Town Square Energy filed documentation that demonstrates it has completed EDI testing with Eversource and Unitil. Staff therefore recommends that the Commission approve Town Square Energy's application to renew its registration as a CEPS, and permit Town Square Energy to serve residential and small commercial customers and to operate in the service areas of Eversource and Unitil. If Town Square Energy seeks to operate in the service areas of other distribution utilities, it can do so by providing proof that it has completed EDI testing with each distribution utility in whose franchise area it requests to operate. Staff will then review the request and make a recommendation to the Commission.

**SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED**

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**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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**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.**