


STATE OF NEW HAMPSHIRE

Inter-Department Communication

DATE: September 16, 2020

AT (OFFICE): NHPUC

FROM: Amanda O. Noonan, Director, Consumer Services
and External Affairs Division 

SUBJECT: DM 20-075, Budderfly, Inc.
Notification of Intent to Conduct Business as Buyer's Aggregator
Staff Recommendation Regarding Reconsideration

TO: Debra A. Howland, Executive Director

CC: David K. Wiesner, Director, Legal Division
Corrine Lemay, Management Analyst

On June 3, 2020, the Commission issued a secretarial letter accepting Budderfly, Inc.'s notification of intent to conduct business as a buyer's aggregator, under N.H. Admin. R., Puc 2003.05(a), subject to the condition that it only serve large commercial and industrial customers and not serve any residential or small commercial customers.

By letter dated June 15, 2020, Budderfly requested reconsideration of the condition that it only serve large commercial and industrial customers and not serve any small commercial customers. Budderfly emphasized that it primarily provides energy management services to its clients, that it becomes the electric customer of record for those clients responsible for payment of utility rates and charges, and that, while the clients nominally fall into the category of small commercial customers, "they are relatively sophisticated business owners." In response to Commission Staff's request for additional clarifying information, Budderfly recently provided to Staff a supplemental description of its business model and two contracts it has entered into with business organizations effectively representing a number of related small retail business outlets.

Staff has reviewed Budderfly's reconsideration request and the supplemental information provided by Budderfly at its request, and Staff has determined it is not necessary to impose any restriction on Budderfly's ability to serve small commercial customers as a buyer's aggregator in New Hampshire.

Staff therefore recommends that the Commission's acceptance of Budderfly's notification to conduct business as a buyer's aggregator be modified so that it is subject only to the condition that Budderfly serve only large or small commercial customers and not serve any residential customers.

Executive.Director@puc.nh.gov

amanda.noonan@puc.nh.gov

bryan.connelly@puc.nh.gov

Corrine.Lemay@puc.nh.gov

david.eldredge@budderfly.com

ocalitigation@oca.nh.gov

richard.chagnon@puc.nh.gov

tom.frantz@puc.nh.gov