

Robert J. Munnelly Jr.

NHPUC 16JAN'18PM12:23

**VIA E-FILEING AND FIRST-CLASS MAIL**

January 11, 2018

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

Re: Docket No. DM 17-125 North American Power and Gas, LLC Renewal Registration as a  
Competitive Electric Power Supplier  
Withdrawal Without Prejudice of October 26, 2017 Request for Waivers Pursuant to Puc  
201.05

Dear Ms. Howland:

On October 26, 2017, North American Power and Gas, LLC ("NAP" or the "Company") requested expedited waivers of certain new Puc 2000 competitive electric power supplier ("CEPS") rules that took effect on November 1, 2017, pursuant to Public Utilities Commission ("Commission") waiver authority in Rule Puc 201.05.

One set of waivers related to potential anomalies and inconsistencies in the new Rules, principally, Puc 2004.02, 2004.08 and 2004.10, as applied to NAP's process for enrolling customers in response to direct mail campaigns. Based on input from Staff, NAP requested clarification from Staff by means of a November 21, 2017 letter and received a response that addressed NAP's principal concerns about potential excess costs and customer confusion. Accordingly, NAP's request has become moot and NAP hereby withdraws its request for a limited waiver with respect to those rules.

Also on October 26, 2017, NAP separately requested a waiver of what it viewed at the time as an unnecessary and confusing requirement in Puc 2004.08(d)(4) that NAP must collect the customer's billing address as a precondition for a valid sale. Given the time that has elapsed, and the Company has complied with the requirement as written, the Company has decided to withdraw its waiver request relative to Puc 2004.08(d)(4) at this time, subject to the potential for a future renewed waiver request in the event NAP's experiences in the field prove to be confusing for customers.

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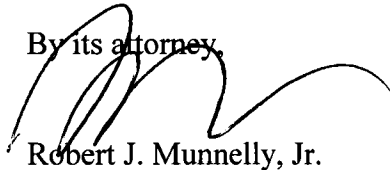
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DAVIS MALM &  
D'AGOSTINE P.C.  
ATTORNEYS AT LAW

Accordingly, for the reasons stated herein, NAP respectfully withdraws, without prejudice, the request for limited waivers to several of the new Puc 2000 rules dated October 26, 2017. NAP thanks the Commission and Staff for their time and consideration in working through these important operational issues. An original and six (6) copies of this waiver request withdrawal are attached pursuant to the Commission's filing rules.

NORTH AMERICAN POWER AND GAS, LLC

By its attorney,

A handwritten signature in black ink, appearing to read 'Robert J. Munnelly, Jr.', is written over the text 'By its attorney,'.

Robert J. Munnelly, Jr.

RJM/jmc

cc: Docket Service List (by email)