

Mail Stop 3561

November 7, 2006

Mr. Steven S. Boss
Chief Executive Officer
Commerce Energy Group, Inc.
600 Anton Boulevard, Suite 2000
Costa Mesa, California 92626

RE: Commerce Energy Group, Inc.
Form 10-K for Fiscal Year Ended July 31, 2005
Filed October 31, 2005
File No. 1-6049

Dear Mr. Boss:

We have completed our review of your Form 10-K and related filings and have no further comments at this time.

Sincerely,

William Thompson
Accounting Branch Chief