

BEFORE THE NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

UNITIL ENERGY SYSTEMS, INC.
Petitioner

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DOCKET NO. DE 23-054

**MOTION FOR WAIVER AND MODIFICATION OF REPORTING
REQUIREMENT IN ORDER NO. 26,850**

Pursuant to N.H. Code of Administrative Rule Puc 203.07, Unitil Energy Systems, Inc. (“Unitil” or the “Company”), respectfully requests waiver and modification of a reporting requirement established in Order No. 26,850 (the “Order”) issued by the New Hampshire Public Utilities Commission (the “Commission”) on June 16, 2023 in the above-referenced docket. As explained in this Motion, the Company has no objection to the reporting requirement itself, and seeks only to modify the timing of the requirement. The Company respectfully requests that the Commission rule on this motion on or before September 10, 2023.

The Order directed the Company to file, by the 10th day of each following month, a summary comparison of the monthly average ISO-New England market electricity prices with the power supply charge components for UES’s Small and Medium customer groups. As the Commission recently recognized in a July 27, 2023 Procedural Order in DE 23-043, the relevant ISO-NE information regarding average wholesale load cost components is not available until later in the month. DE 23-043, Public Service Co. of N.H. d/b/a Eversource Energy, Procedural Order at 1-2 (July 27, 2023). Consistent with the Commission’s Procedural Order in DE 23-043, the Company requests that the Commission waive the requirement that the Company submit a summary filing on the 10th day of each following month during the default service period and modify the Order to extend the summary comparison filing deadline to be 30 days following the end of each month.

In support of this request, the Company states as follows:

1. In the Order, the Commission approved the Company's proposed energy service rates for the period from August 1, 2023 through January 31, 2024. The fifth ordering paragraph on pages 8-9 of the Order requires:

UES, for this upcoming default service rate period, is to file, by the 10th day of the following month, a summary comparison of the monthly average ISO-New England market electricity prices with the power supply charge components for UES's Small and Medium customer groups.

2. To create the required reports, Unitil will use information available from ISO-NE regarding Wholesale Load Cost Components, including monthly average energy and applicable capacity and ancillary services prices. As Eversource explained in its motion for clarification in DE 23-043, monthly Wholesale Load Cost Components reports are typically not published by ISO-NE until the middle of each month. For example, the last three reports were published on June 16, July 14, and August 18, 2023.¹ Accordingly, the Company seeks a waiver of the currently effective reporting requirement and a modification of the Order to extend the applicable filing deadline for the monthly summary comparisons from 10 days to 30 days following the end of each month during the default service period, so that the Company can utilize the necessary data contained in the ISO-NE Wholesale Load Cost Components monthly reports.

3. Good cause exists for the Commission to grant the relief sought in this motion because the currently effective reporting requirement does not align with the publication timing for the ISO-NE Wholesale Load Cost Components monthly reports, which are

¹ <https://www.iso-ne.com/isoexpress/web/reports/load-and-demand/-/tree/mthly-whl-load-cost-rpt>

necessary for the preparation and filing of the monthly summary comparisons. Modifying the filing deadline would enable the Company to use that ISO-NE information in preparation of the monthly summary comparisons.

4. Modifying the reporting requirement such that the filing is due on the 30th day following each month of the default service period will not cause prejudice to the Commission or any party to this docket. The Company will still provide the reports required by the Commission in a timely manner; modification of the filing deadline as requested in this motion will simply ensure that the Company has the required information and sufficient time to compile the report.

5. Accordingly, waiver and modification is warranted under these circumstances and should be granted, to the extent necessary, to specify that the summary comparisons shall be filed within 30 days rather than 10 days following the end of each month.

6. The Department of Energy has indicated that it does not object to the relief sought in this Motion. The Office of the Consumer Advocate has indicated to the Company that it assents to this Motion.

WHEREFORE, Unitil respectfully requests a waiver of the currently effective reporting requirement and modification of the Order, for the reasons stated in this Motion, specifically to:

- A. Designate that the monthly summary comparison filings required pursuant to Order No. 26,850 shall be due within 30 days rather than 10 days following the end of each month during the default service period; and
- B. Grant any such other or further relief as may be just and reasonable.

Respectfully submitted,

UNITIL ENERGY SYSTEMS, INC.
By its Attorney:



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August 25, 2023

CERTIFICATE OF SERVICE

I certify that I have caused copies of Unitil Energy Systems, Inc.'s, "Motion for Waiver and Modification of Reporting Requirement in Order No. 26,850" to be served on the service list in this docket.

Dated this 25th day of August, 2023.



Patrick H. Taylor