

CONSUMER ADVOCATE
D. Maurice Kreis

ASSISTANT CONSUMER ADVOCATE
Pradip K. Chattopadhyay



TDD Access: Relay NH
1-800-735-2964

Tel. (603) 271-1172

Website:
www.oca.nh.gov

OFFICE OF CONSUMER ADVOCATE

21 S. Fruit St., Suite 18
Concord, NH 03301-2441

August 29, 2018

Ms. Debra A. Howland
Executive Director
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, New Hampshire 03301

Re: Docket No. DG 18-103, Northern Utilities, Inc. d/b/a Unitil
Petition for Franchise Authority in Kingston and Atkinson

Dear Ms. Howland:

This follows up on Staff's letter of July 31, 2018 in the above-referenced docket, as well as the August 24, 2018 memorandum from the Commission's Safety Division. The July 31 letter, subsequent to the prehearing conference and technical session of July 24, 2018, noted that Staff would be filing a substantive recommendation by the end of August, after which the parties would make recommendations on how to proceed with this docket.

The Office of the Consumer Advocate (OCA) is concerned about the issues raised in the Safety Division's memorandum. According to the Safety Division, Unitil has been serving some 20 customers in Atkinson for the past 28 years without the requisite franchise authority. We agree with the Safety Division that this revelation raises issues about the Company's compliance with applicable statutes and regulations in a manner that makes it inadvisable for the Commission to resolve this docket via an order *nisi*. Accordingly, we believe there should be formal discovery, an opportunity for Staff and the OCA to submit prefiled testimony, and ultimately an evidentiary hearing in this proceeding. We would welcome the opportunity to discuss such a schedule with Staff and Unitil prior to its adoption by the Commission.

Please feel free to contact me if there are any questions or concerns about the foregoing.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Kreis", written over the word "Sincerely,".

D. Maurice Kreis
Consumer Advocate

cc: Service List