



May 27, 2022

BY E-MAIL

Daniel Goldner, Chair
New Hampshire Public Utilities Commission
21 S. Fruit Street, Suite 10
Concord, NH 03301-2429

Re: Docket No. DE 19-033, Unitil Energy Systems, Inc.

Comments of Unitil Energy Systems, Inc.

Dear Chair Goldner:

On February 13, 2019, Unitil Energy Systems, Inc. d/b/a Unitil (“Unitil” or the “Company”) filed a petition with the New Hampshire Public Utilities Commission (“Commission”) in the instant docket for approval of a proposed time-of-use (“TOU”) study to gather and analyze data to inform the Company, the Commission, and stakeholders when considering potential TOU rate structures (the “TOU Study”). The proposal for the TOU Study was submitted following the Commission’s requirement in Order No. 26,029 (June 23, 2017) in Docket No. DE 16-576 to “develop and propose a TOU pilot program” that could “generate detailed data regarding customer behavior and utility cost and rate impacts related to time-varying rates” and “inform future net metering and general rate designs.” Order 26,029 at 62. Following some initial process, and the interventions of numerous parties, nothing of substance occurred relative to the Company’s TOU Study proposal.

On May 19, 2022, the Commission issued Order No. 26,629 noting that there had been no activity on the TOU Study in approximately three years. The Commission further observed that it had recently “issued Order No. 26,604 (April 7, 2022) which approved TOU rates for Unitil for separately metered electric vehicle charging stations, and Order No. 26,623 (May 3, 2022) which approved a whole house TOU rate for Unitil.” Order No. 26,629 at 3. In light of the fact that no progress had occurred on the TOU Study and that Unitil was now implementing TOU rates approved by the Commission, the Commission “question[ed] the value continuing to pursue the study requested by Unitil in this docket.” *Id.* at 4. Thus, the Commission requested comments

Matthew J. Fossum
Senior Counsel
fossumm@unitil.com

6 Liberty Lane West
Hampton, NH 03842

T 603.773.6537
www.unitil.com

by June 19, 2022 concerning whether the docket should be closed. By these comments, Unitil agrees with the Commission that there is limited, if any, value in continuing the TOU Study and that the docket should be closed.

As described, in recent days the Commission has approved two different structures of TOU rates for Unitil, and Unitil will be implementing those rates in the coming months. Further, although the scope of work outlined in the TOU Study proposal was not evaluated within Docket No. DE 19-033, Unitil nonetheless undertook much of the work envisioned in the TOU Study, particularly in vetting metering and billing capability, as that work was foundational to the TOU proposals later put forward by Unitil and now approved by the Commission.

Accordingly, through the review and approval of the Company's TOU proposals in Order Nos. 26,604 and 26,623, the purpose and intent of TOU Study has been achieved. Moreover, the goals set out by the Commission in Order No. 26,029 to implement TOU rates that would generate detailed data are being, or will be, met. Thus, Unitil agrees that there would not be any value in further pursuing the TOU Study as part of Docket No. DE 19-033, and Unitil supports closing this docket.

Please do not hesitate to contact me if you have any questions concerning this filing.

Sincerely,



Matthew J. Fossum
Senior Counsel

cc: Service List