THE STATE OF NEW HAMPSHIRE BEFORE THE PUBLIC UTILITIES COMMISSION

DE 21-030

UNITIL ENERGY SYSTEMS, INC.

MOTION TO AMEND PROCEDURAL SCHEDULE

Unitil Energy Systems, Inc. ("UES" or the "Company") hereby moves the Commission, pursuant to Puc 203.07, to amend the existing procedural schedule in DE 21-030. The Commission recently partially amended the procedural schedule in a Procedural Order dated November 18, 2021.

In support of this Motion, UES states as follows:

- 1. Under the current procedural schedule (as amended), Data Requests ("DRs") to the Department of Energy ("Energy"), Office of the Consumer Advocate ("OCA") and Intervenor parties are due on December 6, 2021, and responses to the DRs are due December 20.
- 2. On November 23, 2021, the Energy, OCA, and Intervenor parties issued testimony in this docket. Due to the scope and volume of the testimony received on November 23, the intervening holiday, and the press of other regulatory matters, the Company requires an additional two days to compile and issue its DRs.
- 3. UES requests that the procedural schedule be amended such that DRs to the Energy / OCA / Intervenor parties be due on <u>December 8, 2021</u>, and responses to the DRs be due December 22, 2021.

4. The requested amendment is in the public interest, and there is good cause to support

it. The amendment will allow for more robust discovery and a developed record, which is

ultimately in the public interest. The brief amendment (two days) will not prejudice any party

to this docket or the Commission, and no other amendments are requested at this time.

5. Counsel for Energy, the OCA, Conservation Law Foundation, Clean Energy New

Hampshire, and Chargepoint have all provided their assent to the requested amendment.

6. The Company respectfully requests that the procedural schedule be amended such

that DRs to the Energy / OCA / Intervenor parties are due on December 8, 2021, and

responses to the DRs are due December 22, 2021.

WHEREFORE, UES respectfully requests that the Commission:

A. Amend the procedural schedule in this docket such that DRs to the Energy /

OCA / Intervenor parties are due on December 8, 2021, and responses to the DRs are due

December 22, 2021; and

B. Grant such further relief as may be just and appropriate.

Respectfully submitted

UNITIL ENERGY SYSTEMS, INC.

By its Attorney:

Dated: November 30, 2021

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Certificate of Service

I hereby certify that on November 30, 2021, a copy of the foregoing Motion was electronically served upon the Service List.

Patrick H. Taylor