

**STATE OF NEW HAMPSHIRE
BEFORE THE PUBLIC UTILITIES COMMISSION**

DE 21-033

UNITIL ENERGY SYSTEMS, INC.

Annual Major Storm Cost Reserve Fund Report

**DEPARTMENT OF ENERGY’S REQUEST TO ENLARGE TIME TO INVESTIGATE
UNITIL ENERGY SYSTEMS, INC.’S
ANNUAL MAJOR STORM COST RESERVE FUND REPORT**

NOW COMES the New Hampshire Department of Energy (Energy) and in response to the Commission’s “Procedural Order re: Deadline for Response to Annual MSCRF Report” (November 24, 2021), asks the Commission to grant Energy additional time in which to investigate Unitil Energy Systems, Inc. (UES or the Company)’s corrected annual *Major Storm Cost Reserve Fund Report* (MSCRF Report) 2020, filed on September 29, 2021.

In support of this motion, Energy states as follows:

1. UES filed its original MSCRF Report on March 3, 2021. UES filed a corrected annual MSCRF Report 2020 on September 29, 2021, making minimal corrections to pages 2 and 3.
2. On November 24, 2021, the Commission issued an order, giving the Department of Energy until December 28, 2021, to object to UES’s MSCRF Report 2020 or to request additional time to investigate the filing.
3. This is the first MSCRF Report review that will be done by Energy since July 1, 2021, when Energy became a separate department, with Energy staff (formerly PUC Staff) fulfilling a separate and distinct function. See House Bill 2 (2021).
4. In the past, the Commission’s Audit Division Staff would audit the Company’s MSCRF Report and issue an audit report. Thereafter, the Commission’s Electric Division Staff would review the audit report (for the first time) and engage in discussions with the Company. Formal data request might be

issued. The Commission Staff review would result in a Staff Recommendation filed with the Commission. Generally, no formal procedure was either proposed or set prior to Commission Staff filing a letter or recommendation into the docket. See, e.g., Dkt. No 06-107 (GSE); Dkts. No. 20-023, 19-040 and 15-078 (UES).

5. Energy proposes to keep the general procedural steps similar to that past practice. Energy's Audit Division will review the Company's filing, raise any questions or issues with the Company, and issue an audit report. Thereafter, Energy's Regulatory Support Division will review the audit report and engage in follow-up discussions with the Company. Formal data requests may be issued if deemed warranted. Energy will then file its Report (formerly characterized as a "Recommendation") into the docket.

6. It is currently anticipated that Energy's review and investigation will conclude by April 30, 2022 and its final Report will be filed thereafter. Energy's report may propose further procedural steps based on the findings of the review and investigation.

7. Accordingly, Energy asks for additional time in which to complete its review and investigation of UES' MSCRF Report 2020.

8. There is no procedural schedule in place at this time. However, for the information of the Commission in evaluating this request, Energy states as follows:

- a. If the Commission were to deny this request for additional time to review and investigate the MSCRF Report 2020, Energy would be caused undue hardship. Energy's Audit Division has been extremely busy due to the press of other matters in other dockets, and the audit report has not been completed as of this date. It would be challenging and inconvenient if the Audit Division and/or the Regulatory Support Division were required to expedite review and investigation of the Company's MSCRF Report 2020 on a more accelerated timeline;
- b. UES does not object to Energy's request for additional time to review and investigate its MSCRF Report 2020.

Compare with N.H. Code of Administrative Rules Puc 202.04.

9. If Energy's review and investigation of UES' MSCRF Report 2020 is completed sooner than anticipated, Energy's final report will be filed promptly thereafter.

WHEREFORE, Energy respectfully requests that the Commission:

- A. Grant Energy's request to enlarge the time for its review and investigation of UES's MSCRF Report 2020 as described in this motion; and
- B. Grant such other and further relief as is equitable and just.

Respectfully submitted,

Date: December 23, 2021

/s *Mary E. Schwarzer*

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Certificate of Service

I hereby certify that on December 23, 2021, a copy of this objection has been electronically forwarded to the service list.

Mary E. Schwarzer

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