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August 2, 2022

Daniel C. Goldner, Chair  
New Hampshire Public Utilities Commission  
21 South Fruit Street  
Concord, NH 03301-2429

Re: Docket No. DE 22-017, Unitil Energy Systems, Inc.  
2022 Schedule for Default Service Procurement  
Department of Energy Statement Regarding Proposed  
Change in Default Service Period

Dear Chairman Goldner:

The Department of Energy (DOE) has reviewed the Motion for an Expedited Ruling on the Company's Default Service Procurement Timeline (Motion) filed on July 29, 2022 by Unitil Energy Systems, Inc. (Unitil), and submits this letter to state DOE's position regarding the Motion and the process for its approval by the Commission.

The Motion requests that the Commission approve a solicitation for Unitil's next default service period for eight months rather than the previously established six-month period, and that, for future solicitations, the Commission approve default service periods of August 1 through January 31 and February 1 through July 31, consistent with periods for the state's other regulated electric distribution companies.

Unitil maintains that its proposal will have benefits in both the short and the long term for the company and its default service customers. In the short term, for the next solicitation, Unitil believes that "adding the two early summer months of June and July to the solicitation will have the benefit of mitigating what are likely to be extremely high winter default service prices." In the longer term, adjusting the solicitation schedule and resulting service periods will split the traditionally highest priced winter months as well as the traditionally higher priced summer months. By splitting the higher priced months between two separate periods, the resulting rates should reflect more of an annual "average" rate over the course of each year and be less prone to significant seasonal rate differentials.

The DOE confirms that it supports the change proposed by Unitil in the Motion. As noted by the company in the Motion, DOE's agreement with and support for the default service period change proposed in the Motion does not limit its ability to evaluate or propose any

potential further changes to default service procurement timing or processes as may be addressed through the Commission's forthcoming investigation.

The DOE urges the Commission to approve the Motion at the earliest possible time through a streamlined process, such as issuance of an order *nisi*, so that the change in Unifil's default service periods may be implemented with a minimal level of potential disruption to the wholesale market procurement process.

Thank you for your attention to this filing. Pursuant to current Commission policy, this filing is being made electronically only.

Sincerely,

*/s/ David Wiesner*

David K. Wiesner  
Legal Director/Sr. Hearings Examiner

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