



November 2, 2022

**BY E-MAIL**<sup>1</sup>

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

Re: DE 22-073 Petition for Approval of Investment in and Rate Recovery of a  
Distributed Energy Resource Pursuant to RSA 374-G

Chairman Goldner:

On October 31, 2022, Unitil Energy Systems, Inc. (the “Company”) filed a petition with the New Hampshire Public Utilities Commission for approval of investment in and rate recovery of a Distributed Energy Resource pursuant to RSA 374-G. This petition was accompanied by direct testimony from eight witnesses, including Jacob S. Dusling (Exhibit JSD-1). Since the petition was filed, we have identified an error in Mr. Dusling’s testimony.

On Bates Page 000060 of Exhibit JSD-1, Mr. Dusling states: “As noted above, UES estimates that the Kingston Solar Project annual generation will average 8,904 MWh and is expected to offset approximately 57,300 tons of CO2 annually (See Exhibits GPP-1 and GPP-2).”

The characterization of the CO2 offset as an “annual” number is incorrect. The Kingston Solar Project is estimated to offset 57,300 tons of CO2 over the life of the project and not on an annual basis. The avoided tons of CO2 figure is accurately reflected as being over the life of the Kingston Solar Project elsewhere in the filing.<sup>2</sup>

To correct this error, enclosed please find a corrected copy of Bates Page 000060, which replaces the word “annually” with the words “over the life of the project.” The enclosed should be substituted for the erroneous page in Exhibit JSD-1 that was submitted with the Company’s October 31, 2022 filing. Because the enclosed page does not contain

<sup>1</sup> This filing is made electronically in accordance with the Secretarial Letter dated March 17, 2020.

<sup>2</sup> See, e.g., Exhibit KES-1, Bates Page 000028 (“The Company has quantified the expected environmental benefits from the Kingston Solar Project, and as discussed in the joint testimony of Ms. Gilbert and Mr. Pierce, the Project is expected to displace 57,300 tons of CO2 emissions over the expected life of the Project.”)

any confidential information, it can be inserted into both the public and confidential versions of Exhibit JSD-1.

Please do not hesitate to contact me if you have any questions regarding this correction or this filing.

Sincerely,

A handwritten signature in black ink, reading "Matthew Campbell". The signature is written in a cursive, flowing style.

Matthew C. Campbell

cc: Service List (by E-mail)

1 Analysis presented in the in the testimony and accompanying exhibits of Messrs.  
2 Francoeur, Diggins, Goulding, and Pentz. Based on information provided in  
3 response to the Preliminary EPC RFP, the Company has assumed the Project will  
4 generate approximately 12 percent of its nameplate capacity (600 kW) during the  
5 monthly historical ISO-NE peak hour, reducing UES peak load by that amount.

6 **Q. Will the project provide any advanced functionality such as voltage regulation**  
7 **or power factor management?**

8 A. The proposed facility will have the ability to provide advanced functionality such as  
9 voltage control and power factor management that the Company may elect to  
10 implement at a future time.

11 **Q. What are the expected environmental benefits associated with the Kingston**  
12 **Solar Project?**

13 A. CO<sub>2</sub> emissions make up the vast majority of New Hampshire's greenhouse gas  
14 emissions, most of which are generated by burning fossil fuels (e.g., oil, coal, gas)  
15 to produce heat and electricity, and to power vehicles.<sup>12</sup>

16 As noted above, UES estimates that the Kingston Solar Project annual generation  
17 will average 8,904 MWh and is expected to offset approximately 57,300 tons of CO<sub>2</sub>  
18 over the life of the project (*See* Exhibits GPP-1 and GPP-2). In addition to CO<sub>2</sub>  
19 reduction benefits,

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<sup>12</sup> New Hampshire Department of Environmental Services, *Greenhouse Gas Emissions Inventory*,  
<https://www.des.nh.gov/climate-and-sustainability/climate-change/greenhouse-gas> (last visited Sept. 9, 2022).