

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

**UNITIL ENERGY SYSTEMS, INC.**

**Docket No. DE 23-002  
Proposed Purchase of Receivables Program**

**MOTION TO AMEND PROCEDURAL SCHEDULE**

Unitil Energy Systems, Inc. (“Unitil,” the “Company,” or “UES”) respectfully requests, pursuant to Puc 203.7, that the New Hampshire Public Utilities Commission (the “Commission”) amend the existing procedural schedule in DE 23-002—Unitil’s proposed Purchase of Receivables (“POR”) Program. The requested amendment to the schedule will provide the Company with the time necessary to respond to the volume and scope of Technical Session Data Requests that it received following the May 2, 2023 Technical Session. In support of this Motion, Unitil states as follows:

1. On January 10, 2023, in accordance with Puc 2205.16(e), the Company filed a proposal for a POR Program. The Commission docketed this matter as DE 23-002.
2. Unitil, the Department of Energy (“DOE”), NRG Retail Companies, Inc. (“NRG”), and the Community Power Coalition of New Hampshire (“CPCNH”) are parties to DE 23-002 (together the “Parties”).
3. On March 28, 2023, DOE filed a procedural schedule agreed upon by the Parties with the Commission for its review and approval. The schedule includes both a “settlement track” and a “rebuttal track” and the DOE filing explained the Parties will file a status report with the Commission on July 12, 2023 to identify which track the Parties intend to follow.
4. On March 30, 2023, the Commission issued an order approving the proposed schedule, with the remaining dates as follows:

**Table 1: Currently Approved Schedule (Remaining Dates) – Settlement Track**

<b>Event</b>	<b>Date</b>	<b>Calendar Days</b>
Technical Session Data Requests to UES	Friday, May 5, 2023	---
UES Responses to Technical Session DRs	Friday, May 12, 2023	7
DOE, Intervenor Comments/Testimony	Friday, June 9, 2023	28
Technical Session/Settlement Conference	Thursday, June 15, 2023	6
UES Written Data Requests to DOE/Intervenors	Wednesday, June 21, 2023	6
DOE/Intervenor Data Request Responses	Thursday, July 6, 2023	15
Status Conference (among Parties) (remote)	Wednesday, July 12, 2023	6
Parties to file Status Report with PUC	Wednesday, July 12, 2023	0
Last Day to File Settlement <sup>1</sup>	Monday, July 17, 2023	5
Hearing on Settlement (week of July 24th)	Monday, July 24, 2023	7

**Table 2: Currently Approved Schedule (Remaining Dates) – Rebuttal Track**

<b>Event</b>	<b>Date</b>	<b>Calendar Days</b>
Technical Session Data Requests to UES	Friday, May 5, 2023	---
UES Responses to Technical Session DRs	Friday, May 12, 2023	7
DOE, Intervenor Comments/Testimony	Friday, June 9, 2023	28
Technical Session/Settlement Conference	Thursday, June 15, 2023	6
UES Written Data Requests to DOE/Intervenors	Wednesday, June 21, 2023	6
DOE/Intervenor Data Request Responses	Thursday, July 6, 2023	15
Status Conference (among Parties) (remote)	Wednesday, July 12, 2023	6
Parties to file Status Report with PUC	Wednesday, July 12, 2023	0
Rebuttal Testimony	Monday, July 17, 2023	5
DOE/Intervenor Data Requests to UES	Friday, August 11, 2023	25
UES Responses to Data Requests	Friday, August 25, 2023	14
Last Day to File Settlement <sup>2</sup>	Monday, September 4, 2023	10
Hearing One day (Sept 12-15)	Tuesday, September 12, 2023	8

5. Consistent with the existing procedural schedule, on April 7, 2023, the DOE issued the Company thirteen Data Requests and Unitil responded to those requests by the procedural deadline of April 21, 2023.

6. On May 2, 2023, the Parties held the first of two Technical Sessions, and Technical

<sup>1</sup> Will vary depending on hearing date.

<sup>2</sup> Will vary depending on hearing date.

Session Data Requests were issued to Unitil on May 5th. According to the currently approved procedural schedule, the Company's responses to the Technical Session Data Requests are due in five business days, i.e., on May 12, 2023.

7. The Company received thirty-one Technical Session Data Requests.<sup>3</sup> Due to the volume and scope of these Data Requests, the Company requires additional time to compile and review data requested by certain Parties and to conduct research and analyses that must be reviewed and verified prior to filing the responses to the Data Requests. Further, key Company personnel will require additional time to review and verify the information provided in response to the Data Requests to ensure a thorough and accurate response.

8. On Monday, May 8, 2023, the Company contacted DOE, NRG, and CPCNH to request that the Parties agree to a one-week extension of the deadline for the Company to respond to the Technical Session Data Requests (moving the deadline from May 12th to May 19th). The Company proposed two options for the Parties to consider. The first option is to amend only the deadline for the Company to respond to the Technical Data Requests (moving the deadline from May 12th to May 19th) and to leave all the other procedural deadlines unchanged. The second option is to amend the deadline for the Company to respond to the Technical Data Requests and extend all the other procedural deadlines by the same period of time (i.e., extend all the remaining procedural deadlines by seven days).

9. DOE, NRG, and CPCNH all responded to the Company's request for an extension on Monday, May 8th. DOE and NRG expressed their preference for the first option presented by the Company, to amend only the deadline for the Company to respond to the Technical Data Requests and to leave all the other procedural deadlines unchanged. CPCNH expressed a preference for the second option, to amend the deadline for the Company to respond to the

Technical Data Requests and extend all the other procedural deadlines by seven days. The Company agrees with DOE and NRG that option one is the best approach and, accordingly, Unutil is proposing that option in this Motion.

10. It is in the best interest of all Parties, and in the public interest, to ensure the record in this proceeding is as accurate and thorough as possible. Amending the procedural schedule by extending the deadline to response to the Data Requests will afford the Company the necessary time to accurately and thoroughly prepare its responses, while still allowing DOE, NRG, and CPCNH adequate time to develop testimony in response to the complete set of information presented by the Company in response to Data Requests. The extension requested by the Company does not warrant a complementary extension of the remainder of the procedural milestones. The Company therefore requests that the Commission amend the procedural schedule by extending the deadline for Unutil’s responses to the Technical Session Data Requests while leaving all the other procedural deadlines unchanged. The requested amendment to the procedural schedule would result in the following procedural schedule:

**Table 3: Amended Schedule (Remaining Dates) – Settlement Track**

<b>Event</b>	<b>Date</b>	<b>Calendar Days</b>
Technical Session Data Requests to UES	Friday, May 5, 2023	
UES Responses to Technical Session DRs	Friday, May 19, 2023	14
DOE, Intervenor Comments/Testimony	Friday, June 9, 2023	21
Technical Session/Settlement Conference	Thursday, June 15, 2023	6
UES Written Data Requests to DOE/Intervenors	Wednesday, June 21, 2023	6
DOE/Intervenor Data Request Responses	Thursday, July 6, 2023	15
Status Conference (among Parties) (remote)	Wednesday, July 12, 2023	6
Parties to file Status Report with PUC	Wednesday, July 12, 2023	0
Last Day to File Settlement <sup>4</sup>	Monday, July 17, 2023	5
Hearing on Settlement	Monday, July 24, 2023	7

<sup>3</sup> DOE issued 3 Data Requests; NRG issued 4 Data Requests; and CPCNH issued 24 Data Requests.

**Table 4: Amended Schedule (Remaining Dates) – Rebuttal Track**

<b>Event</b>	<b>Date</b>	<b>Calendar Days</b>
Technical Session Data Requests to UES	Friday, May 5, 2023	
UES Responses to Technical Session DRs	<b>Friday, May 19, 2023</b>	<b>14</b>
DOE, Intervenor Comments/Testimony	Friday, June 9, 2023	21
Technical Session/Settlement Conference	Thursday, June 15, 2023	6
UES Written Data Requests to DOE/Intervenors	Wednesday, June 21, 2023	6
DOE/Intervenor Data Request Responses	Thursday, July 6, 2023	15
Status Conference (among Parties) (remote)	Wednesday, July 12, 2023	6
Parties to file Status Report with PUC	Wednesday, July 12, 2023	0
Rebuttal Testimony	Monday, July 17, 2023	5
DOE/Intervenor Data Requests to UES	Friday, August 11, 2023	25
UES Responses to Data Requests	Friday, August 25, 2023	14
Last Day to File Settlement <sup>5</sup>	Monday, September 4, 2023	10
Hearing One day (Sept 12-15)	Tuesday, September 12, 2023	8

11. Although the Company is currently compiling the relevant information and developing responses to the Data Requests, Unitil requests that the Commission grant this request on an expedited basis, prior to the existing May 12, 2023 deadline to file responses to the Technical Session Data Requests.

**WHEREFORE**, Unitil respectfully requests that the Commission amend the existing procedural schedule to extend the time for filing responses to the Discovery Requests from May 12, 2023 to May 19, 2023, while maintaining the remainder of the procedural schedule milestones as they currently exist.

*[signature page to follow]*

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<sup>4</sup> Will vary depending on hearing date.

<sup>5</sup> Will vary depending on hearing date.

Respectfully Submitted,

UNITIL ENERGY SYSTEMS, INC.

By:



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Dated: May 9, 2023

**CERTIFICATE OF SERVICE**

I hereby certify that on this 9th day of May, 2023, a copy of the foregoing Motion was electronically delivered to the Service List in docket DE 23-002.



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Matthew C. Campbell