

**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 FOR EXTENSION OF TIME**

Unitil Energy Systems, Inc. (“Unitil”) respectfully requests, pursuant to Puc 202.04 and 203.7, that the New Hampshire Public Utilities Commission (the “Commission”) extend the deadline for filing comments or exceptions to the Hearing Examiner’s report and recommended order. In support of this motion, Unitil states as follows:

1. On September 1, 2023, the Commission issued a procedural order assigning a member of the Commission’s staff to hear the parties, report the facts, and make recommendations in this matter pursuant to RSA 363:17 (the “September 1<sup>st</sup> Order”). The September 1<sup>st</sup> Order provides an opportunity to file comments or exceptions to the Hearing Examiner’s report and recommendation within 10 calendar days.
2. The Hearing Examiner’s report and recommended order was issued on December 22, 2023. Pursuant to the September 1<sup>st</sup> Order and Puc 202.03(b), comments or exceptions are due January 2, 2024.
3. Unitil respectfully submits that an extension of time until Friday, January 12, 2024 is appropriate due to the complexity of the matters at issue and the federal holidays (and previously planned vacations) intervening between the issuance of the Hearing Examiner’s report and recommendations and the deadline to submit comments and exceptions. The federal holidays are a relevant consideration because key personnel are travelling during this period and not available

to properly review, evaluate, and develop comments and exceptions (as necessary) to the Hearing Examiner's report and recommendations.

4. The granting of this extension will not unduly delay the proceeding or adversely affect the rights of any party because the requested extension is not for a significant period of time, there is no deadline for the Commission to issue an order, and there will be a second phase to this proceeding. Rather, a brief extension of time will serve to ensure the Commission receives fully developed and thoughtful comments should it be necessary to file such comments.

5. Unitil has contacted the other parties in a good faith attempt to gain their consent for the extension. At the time of this filing, Unitil has not received responses from the Department of Energy, the NRG Retail Companies, Inc., or the Community Power Coalition of New Hampshire.

6. Unitil requests expedited consideration of this motion.

**WHEREFORE**, Unitil respectfully requests that the Commission:

- A. Grant Unitil's request extend the time by which comments or exceptions to the Hearing Examiner's report and recommendation are due to January 12, 2023; and
- B. Grant such other relief as may be just and equitable.

*[signature page to follow]*

Respectfully Submitted,

UNITIL ENERGY SYSTEMS, INC.

By:



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Dated: December 26, 2023

**CERTIFICATE OF SERVICE**

I hereby certify that on this 26th day of December, 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