

**Request DOE 1-002:**

Reference Schedule CGKS-2, TOU Testing, at Bates 496-501. Please provide the following:

This appears to be a corporate-wide initiative involving both Unitil and FGE (at Bates 497). "Authorization Comments" at Bates 497 and 499 break-out the expenditure between the two companies at \$259,405 for Unitil (69% share) and \$116,544 for FGE (31% share) totaling the original budget amount of \$375,950. However, Unitil did not provide an updated break-out for the revised budget amount of \$546,300 (at Bates 498). Also, it appears that the final Plant in Service amount of \$416,081 includes both Unitil's and FGE's share of the entire final expenditure for the project.

- a. Please explain these discrepancies and provide the final break-out between Unitil and FGE. Please confirm that this project, encompassing project years 2021 and 2022, is now complete.
- b. According to the Cost Record at Bates 501, more than half of the costs comprising the Install amount of \$416,081 were incurred in 2021. Please explain why it is appropriate to include those costs in this step adjustment.
- c. The "Notes" at Bates 499 reference inclusion of consultant costs of \$70,000 and \$120,000 that were apparently incurred as part of Unitil's proposed TOU Study in Docket DE 19-033. Given that the TOU Study was never submitted for review and approval by the PUC or the docket parties, and that the PUC never approved the consultant costs (estimated at the time to be \$500,000), and nor did the PUC approve Unitil's proposed recovery of those costs through the external delivery charge (EDC), please explain why is it appropriate for Unitil to include those costs in this step adjustment request?

**Response:**

- a. The Revision at Bates 499 is missing the revised allocated amount of the new total authorized dollars on the form but the percentage split is the same as the original. The amounts would have been \$376,947 for UES and \$169,353 for

FGE. Please see DOE 1-002 Attachment 1 for the total project costs including both UES and FGE costs.

The project as scoped out in the authorization is complete.

- b. The UES portion of the project in the amount of \$416,081 was closed to Plant In Service in 2022 when the project was deemed complete. None of the costs incurred were included in 2021's Plant In Service or Completed Construction Not Classified.
- c. The authorization was not for \$120,000 and \$70,000. The authorization was for a total of \$120,016 (\$70,000 and \$50,016).

The budgeted amount of \$50,016 was for billing system modifications related to the TOU proposal submitted and approved in Docket No. DE 21-030. The modifications included work by the vendor to address system limitations related to increasing the TOU meter registers for three-period TOU rates, addressing impacts to the general ledger from adding a new sales class, and new billing scenarios related to adding a new electric vehicle service, specific to retail choice and low-income discounts.

The \$70,000 associated with Concentric cost are related to the initial scoping by the Company for a TOU rate offering. Although a proposal was not submitted in DE 19-033, the underlying work which included the design of TOU rates and the ability to implement TOU rates in the Company's meter data management system, MeterSense as well as its customer information system, EnQuesta was a foundational building block for the final TOU rates proposal filed in the rate case in DE 21-030.

USC Cost Record  
Unitil

Pp Work Order		Je Description	Vend Code	Inv No	Description	Amount
Date	Type					
C-210153-20212522						
202104	95-865	MISC PLANT ADJUSTMENT				\$20,950.38
202105	95-865	MISC PLANT ADJUSTMENT				\$8,923.36
202106	95-865	MISC PLANT ADJUSTMENT				\$10,912.80
202107	95-865	MISC PLANT ADJUSTMENT				\$14,599.41
202108	40-805	VOUCHERS	ENEL X NORTH	INV-00018327		\$12,040.50
202108	95-865	MISC PLANT ADJUSTMENT				\$11,178.63
202109	40-805	VOUCHERS	APOGEE	106619A		\$58,098.00
202109	40-805	VOUCHERS	APOGEE	106619B		\$35,949.00
202109	95-865	MISC PLANT ADJUSTMENT				\$10,363.29
202110	95-865	MISC PLANT ADJUSTMENT				\$15,879.29
202111	40-805	VOUCHERS	SYSTEMS & SOFT	CT000004216		\$1,483.50
202111	95-865	MISC PLANT ADJUSTMENT				\$11,599.49
202112	95-865	MISC PLANT ADJUSTMENT				\$12,202.98
202201	95-865	MISC PLANT ADJUSTMENT				\$13,688.00
202202	95-865	MISC PLANT ADJUSTMENT				\$18,348.32
202203	95-865	MISC PLANT ADJUSTMENT				\$19,982.30
202204	95-865	MISC PLANT ADJUSTMENT				\$23,261.31
202205	95-865	MISC PLANT ADJUSTMENT				\$27,038.56
202206	95-865	MISC PLANT ADJUSTMENT				\$26,302.84
202207	95-865	MISC PLANT ADJUSTMENT				\$9,500.88
202208						\$0.00
202208	95-865	MISC PLANT ADJUSTMENT				\$53,677.29
202209						\$0.00
202209	95-865	MISC PLANT ADJUSTMENT				\$101.23
C-210153-20212522 Total						\$416,081.36
F-021069-20213326						
202104	95-865	MISC PLANT ADJUSTMENT				\$11,615.75
202105	95-865	MISC PLANT ADJUSTMENT				\$3,572.24
202106	95-865	MISC PLANT ADJUSTMENT				\$4,419.15
202107	95-865	MISC PLANT ADJUSTMENT				\$7,068.83
202108	40-805	VOUCHERS	ENEL X NORTH	INV-00018327		\$5,409.50
202108	95-865	MISC PLANT ADJUSTMENT				\$5,427.05
202109	40-805	VOUCHERS	APOGEE	106619A		\$26,102.00
202109	40-805	VOUCHERS	APOGEE	106619B		\$16,151.00
202109	95-865	MISC PLANT ADJUSTMENT				\$4,912.63
202110	95-865	MISC PLANT ADJUSTMENT				\$7,356.34
202111	40-805	VOUCHERS	SYSTEMS & SOFT	CT000004216		\$666.50
202111	95-865	MISC PLANT ADJUSTMENT				\$5,229.80
202112	95-865	MISC PLANT ADJUSTMENT				\$5,454.35
202201	95-865	MISC PLANT ADJUSTMENT				\$5,655.03
202202	95-865	MISC PLANT ADJUSTMENT				\$8,214.45
202203	95-865	MISC PLANT ADJUSTMENT				\$9,015.28
202204	95-865	MISC PLANT ADJUSTMENT				\$10,481.98
202205	95-865	MISC PLANT ADJUSTMENT				\$12,181.98
202206	95-865	MISC PLANT ADJUSTMENT				\$11,839.34
202207	95-865	MISC PLANT ADJUSTMENT				\$4,301.03

USC Cost Record  
Unitil

Pp Work Order							
Date	Type	Je Description	Vend Code	Inv No	Description		Amount
<b>F-021069-20213326</b>							
202208							\$0.00
202208	95-865	MISC PLANT ADJUSTMENT					\$21,815.39
202209							\$0.00
202209	95-865	MISC PLANT ADJUSTMENT					\$101.23
<b>F-021069-20213326 Total</b>							<b>\$186,990.85</b>
							<b>\$603,072.21</b>