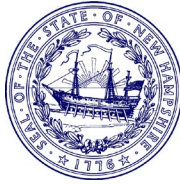


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August 1, 2023

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

Re: DE 23-065; Unitil Energy Systems, Inc.; Petition of for Waiver of Puc 307.05 and Authority to Change Short-Term Debt Limit Formula; Proposed Procedural Schedule and Request for Additional Time to Complete the Department of Energy's Recommendation

Dear Chairman Goldner:

On June 22, 2023, Unitil Energy System, Inc. (Unitil or UES) filed a petition seeking to increase its short-term debt limit. The Commission issued a Procedural Order in this matter on July 10, 2023 requesting that the Department of Energy (DOE or Department) file an analysis and recommendation regarding the petition on or before August 14, 2023.

Unitil's petition request raises questions involving the significant increase in the debt limit from \$40 million to \$59.9 million and modification of the existing debt limit formula. DOE would like to review in particular Unitil's increased use of short-term debt for non-capital purposes such as debt reduction (sinking fund payments) and power purchases. As a result, the Department will need more time to review the details and implications of Unitil's request.

Unitil's last short term debt limit increase request in Docket DE 08-085 involved similar issues and had a duration of approximately 10 months before all issues were ultimately resolved in a settlement between the parties. In the present docket, the Department does not anticipate a year long process given that the fundamental issues associated with the establishment of the debt limit formula were addressed in DE 08-085. However, the Commission's requested deadline of August 14, 2023 for DOE's recommendation does not allow sufficient time for the Department to perform a thorough review of the filing which will involve discovery, related technical sessions with the Company, and written testimony by DOE.

Based on consideration of these issues, the Department requests that a deadline for DOE's recommendation be set for October 6, 2023 and requests that the Commission approve the following procedural schedule set forth below.

Proposed Procedural Schedule

Data Requests on Utility Filing Round 1	August 8, 2023
Responses to Data Requests Round 1	August 18, 2023
Technical Session	August 22, 2023
Technical Session Data Requests	August 24, 2023
Responses on Technical Session Data Requests	September 6, 2023
Data Requests on Utility Filing Round 2	September 8, 2023
Responses to Data Requests Round 2	September 18, 2023
DOE Proposed Recommendation Due	October 6, 2023
UES Data Requests	October 9, 2023
Responses to UES Data Requests	October 20, 2023
UES Rebuttal	October 27, 2023

The Department has provided UES and the Office of the Consumer Advocate (OCA) with a copy of this letter including the proposed procedural schedule. However, neither UES nor the OCA have provided their positions.

Consistent with the Commission's current practices this letter is being filed only in electronic form.

Sincerely,

/s/ *Molly M. Lynch*

Molly M. Lynch, Esq.
Hearings Examiner/Attorney

cc: Service List; Paul Dexter, Esq; and Donald Kreis, Esq.

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