



December 20, 2024

**By Electronic Mail**

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

**DE 24-065: Unitil Energy Systems, Inc. Default Service**

Chairman Goldner:

Unitil Energy Systems, Inc. (“Unitil” or “Company”) hereby submits this position statement in compliance with the Commission’s Order No. 27,086 issued on December 12, 2024. During the hearing held on December 10, 2024 on this matter the Commission expressed concerns regarding the reconciliation balances and how they are collected through default service rates. The Company witnesses responded to questioning on this matter and the Company indicated that it would inform the Commission on December 20, 2024 whether it plans to make a proposal for a change in the recovery method used to collect the default service reconciliation balance.

The Company has met internally and does plan to make a proposal regarding treatment of the default service reconciliation balance. The Company plans to file its proposal on or about February 14, 2025.<sup>1</sup> Pursuant to the Commission’s Order the Company is placing the power supply reconciliation balances in a deferral account with carrying charges to be assessed and has provided, along with this filing, a recalculation of its energy service tariff rate elements.<sup>2</sup> The Company wishes to note however, that placing the reconciliation in a deferral account should in no way be perceived as the Company’s position on the recoverability of these amounts. The Company is entitled to recovery of these balances and plans to make a proposal on where these balances should be collected, not whether these balances should be collected.

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<sup>1</sup> Pursuant to the Commission’s December 12, 2024 Order, the Company will make a filing on January 31, 2025 which will include: (1) the Company’s proposal to self-supply 100% of its large customer group; and (2) the Company’s Commission directed proposal to self-supply 50% of its small and medium customer groups.

<sup>2</sup> The filing contains information which the Company submits is Confidential. The Company seeks confidential and protected treatment for this information pursuant to the provisions of Puc 201.06(15).

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Alice Davey  
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In the Order, the Commission directs the Company to consider integrating other charges, for example, uncollected accounts and internal company administrative costs, into collection or refund through a UES distribution rate charge, such as those established by the Stranded Cost Recovery and External Delivery Charge, through a noticed adjudication. The Company plans to consider the ratemaking treatment of these charges when making its proposal and, in addition, the Company will consider recovery of over- or under- collections of RECs in its proposal.<sup>3</sup> The Company again notes that any future adjudication should be limited to how the reconciliation balance and other charges will be collected and should not include discussion of whether these charges should be recovered, as that has already been adjudicated through the Company's current and past default service proceedings.

Please do not hesitate to contact me with any questions regarding this filing.

Sincerely,

A handwritten signature in cursive script that reads "M. Alice D." followed by a long, wavy horizontal line.

Alice Davey  
Attorney for Unitil Energy Systems, Inc.

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<sup>3</sup> The Company is also aware of Eversource's currently pending docket DE 24-112. Decisions in that docket may inform the Company's proposal.