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

Docket No. DE 16-384 UNITIL ENERGY SYSTEMS, INC. Request for Change in Rates

## MOTION FOR CLARIFICATION

Pursuant to N.H. Admin. Rules, Puc 203.07, Acadia Center hereby submits this motion for clarification of Order 25,906 issued on June 9, 2016 in the above-captioned docket.

In support of its motion, Acadia Center states the following:

- 1. Order 25,906 suspended the investigation of the proposed tariff schedule Schedule DDER in this proceeding and stayed any litigation specific to that Schedule. (pp. 8-9).
- 2. Because of that stay, Order 25,906 states that "we also defer any decision on the petition to intervene." (p. 8). This appears to be on the grounds that the intervenors are primarily concerned with the issues around Schedule DDER.
- 3. Acadia Center does share the concerns of the other intervenors described in the order regarding Schedule DDER but Acadia Center's interest in the docket is broader. Acadia Center's petition to intervene equally relied on both the proposed substantial increase in monthly customer charges and the proposed Schedule DDER. (Acadia Center Petition at p. 1). At the pre-hearing conference, Acadia Center further described concerns with the customer charge proposal and the minimum system method for cost allocation.
- 4. Acadia Center has considerable experience with the rate design issues and impacts of proposals for increased customer charges, as demonstrated by the experience cited in the Acadia Center Petition. This is complemented by Acadia Center's experience with New Hampshire energy and electric utility policy more generally.
- 5. To build consumer-friendly and clean energy systems, Acadia Center spends considerable time, effort, and monetary resources working to ensure that utility rate design preserves incentives to use energy wisely in New Hampshire, Rhode Island, Massachusetts, Maine, Connecticut, and New York.

6. Accordingly, Acadia Center's rights, duties, privileges, immunities or other substantial interests may be affected by this proceeding. Acadia Center's participation in this proceeding is in the interests of justice and will not impair the orderly and prompt conduct of the proceedings as demonstrated by substantial contributions and participation in other dockets.

WHEREFORE, Acadia Center respectfully requests that this motion for clarification be granted and the Acadia Center be allowed to participate in this proceeding as a full party.

Respectfully submitted,

Ellen B. Heure

Senior Analyst, Energy Systems and Carbon Markets

Acadia Center

ehawes@acadiacenter.org

Phone: (802)649-1140 Cell: (207) 233-4182 www.acadiacenter.org

Dated: June 14<sup>th</sup>, 2016

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing petition has on this 14<sup>th</sup> day of June 2016 been sent by email to the service list in Docket No. DE 16-384.

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Ellen Hawes Senior Analyst, Energy Systems and Carbon Markets Acadia Center