



October 28, 2016

Debra A. Howland
 Executive Director and Secretary
 New Hampshire Public Utilities Commission
 21 S. Fruit St, Suite 10
 Concord, N.H. 03301-2429



**Re: Unitil Energy Systems, Inc.
Revised Annual Renewable Portfolio Standard Compliance Filing
for the 2014 and 2015 Compliance Years**

Dear Secretary Howland:

On June 27, 2016, Unitil Energy Systems, Inc. (“UES” or the “Company”) submitted its annual RPS compliance filing for the 2015 compliance year pursuant to New Hampshire RSA 362-F:8 and Puc 2503.03. The filing included the Company’s Form E-2500, quarterly NEPOOL GIS reports entitled “My Settled Certificates Disposition,” electronic versions of GIS Certificate documentation, and payment approval confirmation of the alternative compliance payment. The Company made a similar filing relative to the 2014 compliance year on July 1, 2015.¹

During its review of the Company’s 2015 compliance filing, the Commission Staff discovered a calculation error that, upon further review by the Company, is attributable to an error in Unitil’s 2014 compliance filing. Unitil now submits revised Forms E-2500 for the compliance years 2014 and 2015 to rectify the error.

Specifically, the company has first corrected Table 1: NH RPS Obligation Calculation in its form E-2500 for the 2014 compliance year, which results in a reduction to the amount of required Alternative Compliance Payments (“ACP”). The amount of ACP initially paid by Unitil for the 2014 compliance year was \$201,201; the revised ACP is \$183,833, and as such the Company requests a refund of \$17,368. The change to Table 1 also impacts the amount of RECs that Unitil can carry forward for use in 2015.

The revisions to the Company’s Form E-2500 for the 2014 compliance year necessitate similar changes to Form E-2500 for the 2015 Compliance Year. Specifically, Unitil has revised Table 1: NH RPS Obligation Calculation in the 2015 Form E-2500, which again results in a reduction to the amount of ACP required from the Company in 2015. The amount of ACP initially paid for 2015 compliance was \$51,970; the revised ACP requirement is \$7,881. Thus, the Company requests a refund of \$44,089.

¹ The Company subsequently submitted a revised filing on July 24, 2015.

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Commission rule Puc 2503.03 requires that the Company provide its Annual Compliance Report and ACP on or before July 1 of each year. To the extent that the Commission believes that a waiver of the Puc 2503.03 July 1 deadline is required to accept the enclosed revised Forms E-2500 for the 2014 and 2015 compliance years and issue the requested refunds, Unitil hereby requests that the Commission grant such a waiver pursuant to Puc 201.05. The requested waiver serves the public interest in that it ensures accurate compliance reporting and corrects an ACP over-payment. Acceptance of the enclosed reports and issuing a refund of the ACP over-payments for the 2014 and 2015 compliance years satisfies the purpose of Puc 2503.03, and will not disrupt the orderly and efficient resolution of matters before the Commission.

Please feel free to contact me with any questions about the filing or associated materials provided.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick H. Taylor", written over a horizontal line.

Patrick H. Taylor

Enclosures

cc: Liz Nixon, Public Utilities Commission