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STATE OF NEW HAMPSHIRE



PUBLIC UTILITIES COMMISSION

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January 26, 2017

Patrick H. Taylor, Esq.
Unitil Energy Systems, Inc.
6 Liberty Lane West
Hampton, NH 03842

Re: DE 16-843 Unitil Energy Systems, Inc.
Request for Waiver of Puc 2503.03

Dear Mr. Taylor:

On October 28, 2016, Unitil Energy Systems, Inc. (Unitil) filed revised versions of Unitil's Renewable Portfolio Standard (RPS) Annual Report Form E-2500 for compliance years 2014 and 2015, along with a request for a waiver of N.H. Code Admin. Rules Puc 2503.03 that requires electricity providers to file an annual report demonstrating RPS compliance for each year by July 1 of the following year.

Unitil stated that, following discovery of a calculation error in its 2015 RPS compliance filing, it determined there had also been an error in its 2014 RPS compliance filing. Unitil proposed to correct the 2014 annual report error by revising the total electricity sales sold or delivered to end-use customers as listed in Table 1 therein, resulting in a reduction in the amount of required RPS alternative compliance payments (ACPs) for compliance year 2014 from \$201,201 to \$183,833; Unitil therefore requested a refund of \$17,368 for compliance year 2014. The change in electricity sales listed in Table 1 in the 2014 RPS compliance annual report would also affect the quantity of renewable energy certificates (RECs) that Unitil could carry forward for RPS compliance in 2015, as shown in Table 4 in the annual report for compliance year 2014. The amount of ACP paid by Unitil for 2015 compliance was \$51,970; the revised ACP requirement is \$7,881. Thus, Unitil is also requesting a refund of \$44,089 for compliance year 2015.

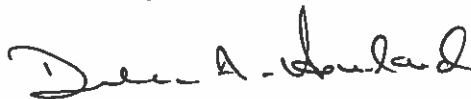
Unitil asserted that the requested waiver would serve the public interest because it would ensure accurate compliance reporting and correct an ACP over-payment. Unitil also maintained that Commission acceptance of the revised RPS annual compliance reports and issuance of a refund of ACP overpayment for the 2014 and 2015 compliance years would satisfy the purpose of Puc 2503.03 and would not disrupt the orderly and efficient resolution of matters before the Commission.

The Commission has permitted electricity providers to make corrections and revisions to their RPS annual reports within a reasonable period of time after filing. Accordingly, a request for waiver of Puc 2503.03 for the 2015 compliance year report submitted on June 27, 2016 is not required, and the Commission will accept a revised Form E-2500 and will refund Unitil for its ACP overpayment of \$44,089 for that compliance year.

The Commission has determined, however, that a waiver of Puc 2503.03 is required in order to accept a revised Form E-2500 for compliance year 2014 and pay the requested refund of \$17,368 for that compliance year. The Commission has granted the waiver to accept a revised Form E-2500 Annual Report for compliance year 2014, but has declined to grant the request for payment of the \$17,368 refund, inasmuch as granting the request for a refund would not be in the public interest because it would be disruptive to the Commission's administration of the RPS program, to budgeting with respect to the renewable energy fund, and to planning renewable energy fund expenditures.

Accordingly, Unitil's request for a waiver from the provisions of Puc 2503.03 to accept for filing a revised version of its RPS annual compliance report for 2014, and the resultant banking of all unused RECs from vintage years 2013 and 2014, is granted, but its request for a refund of ACPs paid for compliance year 2014 in the amount of \$17,368 is denied.

Sincerely,

A handwritten signature in dark ink, appearing to read "Debra A. Howland", written in a cursive style.

Debra A. Howland
Executive Director

cc: Service List
Docket File

SERVICE LIST - EMAIL ADDRESSES- DOCKET RELATED

Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.

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FILING INSTRUCTIONS:

- a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:**
- DEBRA A HOWLAND
EXEC DIRECTOR
NHPUC
21 S. FRUIT ST, SUITE 10
CONCORD NH 03301-2429
- b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.**
- c) Serve a written copy on each person on the service list not able to receive electronic mail.**