

STATE OF NEW HAMPSHIRE  
before the  
PUBLIC UTILITIES COMMISSION

Investigation into Effects of the COVID-19 Emergency on Utilities and Utility Customers

Docket No. IR 20-089

**COMMENTS OF UNITIL ENERGY SYSTEMS, INC AND NORTHERN UTILITIES, INC**  
**IN SUPPORT OF**  
**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE**  
**D/B/A EVERSOURCE ENERGY'S MOTION FOR REHEARING**

Unitil Energy Systems, Inc. ("UES") and Northern Utilities, Inc. ("Northern") (together "Unitil") hereby join in and fully support the Motion for Rehearing ("Motion") of New Hampshire Public Utilities Commission Order No. 26,495 ("Order"), submitted in this docket by Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource"), and submit the following additional comments and requests for relief:

1. The distribution rates currently in effect for UES and Northern were established pursuant to approved settlement agreements in each company's most recent rate cases, DE 16-384 and DG 17-170, respectively. As provided in the Response to Revised Staff Recommendation submitted by Unitil on December 4, 2020, the level of late payment charge revenue included in the revenue requirement for UES approved by settlement in docket DE 16-384 was \$481,633. The level of late payment charge revenue included in the revenue requirement for Northern approved via settlement in docket DG 17-170 was \$104,863. The inclusion of an assumed level of late payment charge revenue in the calculation of the revenue requirement has significance. If that amount of assumed revenue was not included in the calculation, the revenue shortfall would have been larger and the resulting rates necessary to recover the agreed upon level of costs and return on investment would have been greater as well. By denying deferral accounting for, at a minimum, the portion of late payment charge revenue the companies were prohibited from collecting during the period of the prohibition of charging for late payments pursuant to Order No. 26,343, the Commission has effectively imposed a rate decrease on the companies. Unitil submits that this effective rate decrease was imposed without the determinations required by RSA 378:7 that the current rates were "unjust and unreasonable." Accordingly, Unitil seeks rehearing on this issue.

2. UES requests clarification of the Commission's determination "the question of recovery of these expenses is best addressed in the context of each utility's *next* rate case." Order at 8-9 (Emphasis supplied). As the Commission is aware, UES has a *pending* rate case in docket DE 21-030. UES seeks clarification that the company is not prohibited from seeking recovery in DE 21-030 of its incremental bad debt and waived late fees incurred during the period covered by the Governor's Emergency Orders Nos. 3 and 58.

3. Additionally, Unitil would like to receive clarification and the purpose of the information that has been requested to be submitted by August 30, 2021. Specifically related to bullet 3: “Provide a summary of incremental bad debt and waived late payment fees due to COVID-19, calculated as the actual charge-offs from April 1, 2020 to June 30, 2021 above the three year average of such net charges-offs for 2017, 2018, and 2019.” The concern with providing the information as requested, is that it does not capture the complete picture of how the disconnection moratorium impacts the Company’s financials. Since the mandated disconnection moratorium was in place and limited the ability of the Company to disconnect customers for non-payment, the actual write-offs from April 1, 2020 to June 30, 2021 is below the 3 year average. But write offs are only part of the bad debt expense incurred by company. The annual bad debt expense for the Company equals write-offs (net of recoveries) plus an allowance for doubtful accounts entry.

4. For the above reasons, as well as the reasons articulated in Eversource’s Motion, Unitil submits that reconsideration and clarification of the Order is necessary and appropriate.

WHEREFORE, Unitil respectfully requests that the Commission:

- A. Grant reconsideration as provided above; and
- B. Grant such further relief as is just and equitable.

Respectfully submitted,

Unitil Energy Systems, Inc.  
Northern Utilities, Inc.

By its Attorney,



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