

**STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

DE 19-033

UNITIL ENERGY SERVICES, INC.

Petition for Approval of Proposed Time of Use Study

Order Requesting Comments on Closing Docket

O R D E R N O. 26,629

May 19, 2022

I. PROCEDURAL HISTORY

On February 13, 2019, Unitil Energy Services, Inc. (Unitil or the Company) petitioned the Commission for approval of a proposed time of use study to gather and analyze data to inform the Company, the Commission and stakeholders in the consideration of potential time of use rate structures (TOU Study). On February 27, 2019, the Commission issued an order of notice commencing this docket and scheduling a prehearing conference. The Office of Consumer Advocate (OCA) indicated that it would participate in the proceeding and Conservation Law Center (CLF) requested and was granted intervenor status. Gerald M. Eaton, a Unitil ratepayer, was also granted intervenor status. The prehearing conference was held on March 26, 2019. Technical sessions were held on April 19, and May 14, 2019. No further actions appear to have been taken in this docket.

II. BACKGROUND

On June 23, 2017, the Commission issued an Order Accepting Settlement Provisions, Resolving Settlement Issues, and Adopting a New Alternative Net Metering Tariff, Order No. 26,029, DE 16-576 (June 2017 Net Metering Order). In its June 2017 Net Metering Order, the Commission directed Unitil to “develop and propose a TOU

pilot program, open to both residential and small commercial customers and to both distributed generation (DG) and non-DG customers, with a statistically significant number of participants in each category to ensure the data and results generated by the program are statistically valid.” June 2017 Net Metering Order at 62. The Commission found that “a well-designed TOU pilot program should generate detailed data regarding customer behavior and utility cost and rate impacts related to time-varying rates, and that data can inform future net metering and general rate designs, including a potential transition to TOU rate alternatives for all customer rate classes.” *Id.*

III. POSITIONS OF THE PARTIES

A. Unitil

According to Unitil, it developed a proposed TOU Study in response to the Commission’s directives in the June 2017 Net Metering Order. The proposed TOU Study was intended to assess the Company’s technical ability to efficiently implement metering and billing of the selected TOU rate design(s) and to assess requirements needed to provide competitive electric power suppliers the opportunity to offer power supply to customers under TOU rates, to the extent competitive electric suppliers are interested in offering TOU rates. The TOU Study was also designed to explore ways to explain and promote TOU rates, while assessing customer acceptance of TOU rates and interest among vendors in providing products and services that will help customers take advantage of TOU rates. Unitil estimated the cost of the study to be approximately \$500,000.

B. CLF

At the prehearing conference CLF indicated that Unitil had run a TOU pilot in 2011 and was now only proposing a study of TOU. According to CLF the June 2017

Net Metering Order directed the utilities to initiate a pilot by 2018. CLF noted that there were only a few intervenors in this docket and suggested that this matter might have better stakeholder involvement if it were put into DE 16-576, the net metering docket.

C. OCA

OCA agreed with CLF's concern that this was a study and not a TOU pilot. Further, OCA objected to the proposed cost of the study, \$500,000, claiming it was too high. Finally, OCA observed that Unitil was the only utility in New Hampshire with advanced metering technology and that 3,000 Unitil customers have meters capable of recording interval data. According to OCA, this metering capability would be put to better use in a TOU pilot where data could be collected and analyzed. OCA also observed the limited number of intervenors in this docket and suggested that the net metering docket might provide a more robust stakeholder process.

D. Department of Energy

Department of Energy (DOE) staff agreed generally with the comments of CLF and OCA. DOE also had concerns about whether the TOU study was sufficiently focused on distributed generation resources. DOE committed to working with the parties to resolved open issues.

IV. COMMISSION ANALYSIS

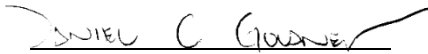
The Commission observes that three years have elapsed since there appears to have been any activity in this docket. Recently, the Commission issued Order No. 26,604 (April 7, 2022) which approved TOU rates for Unitil for separately metered electric vehicle charging stations, and Order No. 26,623 (May 3, 2022) which approved a whole house TOU rate for Unitil. These two Unitil rate offerings should provide some data concerning costs and usage patterns for customers taking TOU rates. Given the

changed circumstances concerning TOU rates, the Commission questions the value of continuing to pursue the study requested by Unitil in this docket. Accordingly, we will request comments from the parties concerning whether this docket should remain open or be closed.

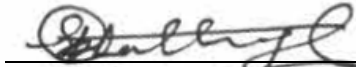
Based upon the foregoing, it is hereby

ORDERED, that any party wishing to comment on whether this docket should remain open, or be closed, shall do so in writing within 30 days of the date of this order.

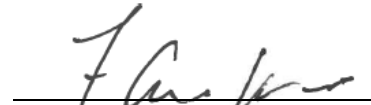
By order of the Public Utilities Commission of New Hampshire this nineteenth day of May, 2022.



Daniel C. Goldner
Chairman



Pradip Chattopadhyay
Commissioner



F. Anne Ross
Special Commissioner

Service List - Docket Related

Docket# : 19-033

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Email Addresses

ClerksOffice@puc.nh.gov
karen.p.cramton@energy.nh.gov
eatongm272@comcast.net
epler@unitil.com
thomas.c.frantz@energy.nh.gov
tirwin@clf.org
nkrakoff@clf.org
donald.m.kreis@oca.nh.gov
elizabeth.r.nixon@energy.nh.gov
amanda.o.noonan@energy.nh.gov
ocalitigation@oca.nh.gov
deandra.m.perruccio@energy.nh.gov
nathan@votesolar.org
jvanrossum@clf.org
david.k.wiesner@energy.nh.gov