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N.H.P.U.C. Case No.DE 13-195

Exhibit No.

Witness KS



July 12, 2013

## By Overnight Mail and E-mail

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

Re:

Unitil Energy Systems, Inc. 2013 LCIRP Report

Dear Director Howland:

Enclosed on behalf of Unitil Energy Systems, Inc. ("Unitil" or "the Company") is the Company's 2013 Least Cost Integrated Resource Plan ("LCIRP"), submitted pursuant to RSA 378:38.

The Company notes that, pursuant to the Settlement Agreement approved by the Commission in DE 10-055, a review by Commission Staff and its consultant of the Company's engineering and operations practices and procedures as they pertain to system reliability, operational efficiency improvement and system planning is currently underway. In addition, much of the distribution planning information provided in this Report has been previously filed by the Company or discussed at hearing in dockets DE 12-055 and DE 13-065.

## Request for Waiver

Pursuant to RSA 378:38-a, Unitil requests that the Commission grant it a waiver of the requirement to file a least cost integrated resource plan, with the exception of a plan relating to transmission and distribution. In support of this request, Unitil states that it does not own any generation plant or facilities, and is not a party to any long term purchase power contracts. Unitil solicits for default service on behalf of those of its customers who do not purchase power directly from third party

Gary Epler Chief Regulatory Counsel epler@unitil.com

6 Liberty Lane West Hampton, NH 03842

<sup>&</sup>lt;sup>1</sup> Please note that Unitil does not own transmission facilities. The enclosed Report, however, discusses the extent of the Company's participation in regional and local transmission planning activities.

competitive suppliers. The Company's solicitation process is in accordance with the terms of a Settlement Agreement approved by the Commission in NHPUC Order No. 24,511, as modified by the approvals granted in subsequent orders. With respect to energy efficiency issues, Unitil is an active participant in New Hampshire's Core Energy Efficiency programs. Accordingly, the Company submits that a reasonable basis exists for a waiver to be granted.

Please do not hesitate to contact me directly if you have any questions or concerns regarding this filing. Thank you for your attention to this matter.

Sincerely,

**Gary Epler** 

Attorney for Unitil Energy Systems, Inc.

## Enclosure

cc: Suzanne Amidon, Staff Counsel

Susan Chamberlin, Consumer Advocate