

STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION

March 27, 2014 - 10:09 a.m.  
Concord, New Hampshire

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RE: DE 13-195  
UNITIL ENERGY SYSTEMS, INC.:  
2013 Least Cost Integrated  
Resource Plan.

PRESENT: Chairman Amy L. Ignatius, Presiding  
Commissioner Robert R. Scott  
Commissioner Martin P. Honigberg

Clare E. Howard-Pike, Clerk

APPEARANCES: Reptg. Unitil Energy Systems, Inc.:  
Gary Epler, Esq.

Reptg. Residential Ratepayers:  
Susan Chamberlin, Esq., Consumer Advocate  
James Brennan  
Office of Consumer Advocate

Reptg. PUC Staff:  
Suzanne G. Amidon, Esq.  
Leszek Stachow, Electric Division

Court Reporter: Steven E. Patnaude, LCR No. 52

ORIGINAL

## I N D E X

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## WITNESS PANEL:

KEVIN SPRAGUE  
LESZEK STACHOW

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**E X H I B I T S**

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1                                   P R O C E E D I N G

2                   CHAIRMAN IGNATIUS: I'd like to open the  
3                   hearing in Docket DE 13-195. This is Unitil Energy  
4                   Systems' Least Cost Integrated Plan. Let's begin first  
5                   with appearances.

6                   MR. EPLER: Good morning, Commissioners.  
7                   Gary Epler, on behalf of Unitil. And, with me today, to  
8                   my right, is John Bonazoli, who is the Manager of Electric  
9                   Engineering for Unitil, and on the stand is Kevin Sprague,  
10                  who is the Director of Engineering at Unitil. Thank you.

11                  CHAIRMAN IGNATIUS: Good morning.  
12                  Welcome.

13                  MS. CHAMBERLIN: Good morning. Susan  
14                  Chamberlin, Consumer Advocate for the residential  
15                  ratepayers, and with me today is Jim Brennan.

16                  CHAIRMAN IGNATIUS: Good morning.

17                  MS. AMIDON: Good morning. Suzanne  
18                  Amidon, for Commission Staff. And, on the stand is Les  
19                  Stachow, who is an Analyst with the Electric Division.

20                  CHAIRMAN IGNATIUS: Welcome, everyone.  
21                  I understand a Settlement Agreement has been filed, which  
22                  we've reviewed, and wanted to know if there's anything we  
23                  need to take up before we begin with the witnesses?

24                  MS. AMIDON: We'll probably mark the

[WITNESS PANEL: Sprague~Stachow]

1 Settlement for identification as "Exhibit 1".

2 CHAIRMAN IGNATIUS: Has the filing  
3 itself been marked as an exhibit already?

4 MR. EPLER: I don't believe so, Chairman  
5 Ignatius. I checked the transcript of the prehearing  
6 conference, and it didn't seem to be. So, I guess then  
7 the filing that was made on July 16th, if we could have  
8 that premarked as "Exhibit 1".

9 MS. AMIDON: Okay.

10 MR. EPLER: And, then, the Settlement  
11 Agreement would be "Exhibit 2".

12 CHAIRMAN IGNATIUS: All right. Is it --  
13 the 16th, that may be a filing date. The copy I have  
14 doesn't show a date stamp. It has your date of July 12th  
15 in the letter.

16 MR. EPLER: Right. But I just checked  
17 the Docketbook, and it has it as the 16th.

18 CHAIRMAN IGNATIUS: All right.

19 MR. EPLER: I don't know if that was a  
20 weekend or what the issue was. So, whichever date you  
21 you'd prefer, any date between those two.

22 CHAIRMAN IGNATIUS: So, we'll mark the  
23 large packet that was dated July 12th, 2013 and filed  
24 July 16th as "Exhibit 1" for identification. And, then,

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1 the Settlement Agreement, which was filed March 20th,  
2 2014, as "Exhibit 2".

3 (The documents, as described, were  
4 herewith marked as **Exhibit 1** and  
5 **Exhibit 2**, respectively, for  
6 identification.)

7 CHAIRMAN IGNATIUS: Anything else to  
8 take up before we swear the witnesses? Seeing nothing,  
9 then, Mr. Patnaude, would you do that please.

10 (Whereupon **Kevin Sprague** and  
11 **Leszek Stachow** was duly sworn by the  
12 Court Reporter.)

13 CHAIRMAN IGNATIUS: Please proceed.

14 **KEVIN SPRAGUE, SWORN**

15 **LESZEK STACHOW, SWORN**

16 **DIRECT EXAMINATION**

17 BY MR. EPLER:

18 Q. Mr. Sprague, could you identify your business position  
19 with Unitil.

20 A. (Sprague) Yes. I am the Director of Engineering for  
21 Unitil.

22 Q. And, did you prepare or have prepared under your  
23 direction the Unitil's Least Cost Integrated Resource  
24 Plan, which has been marked as "Exhibit 1"?

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[WITNESS PANEL: Sprague~Stachow]

1 A. (Sprague) Yes, it was.

2 Q. And, do you have any changes or corrections to that?

3 A. (Sprague) Not at this time.

4 Q. And, were you also involved in the technical sessions  
5 and discussions with the Staff and the Office of  
6 Consumer Advocate in this proceeding?

7 A. (Sprague) Yes, I was.

8 Q. And, have you reviewed and are you familiar with the  
9 Settlement Agreement?

10 A. (Sprague) Yes, I am.

11 Q. As part of the Settlement Agreement in Docket 10-055,  
12 Unitil agreed to hire a consultant to review its  
13 distribution system. Are you aware of that provision?

14 A. (Sprague) Yes. I am aware of that provision.

15 Q. And, do you know the status of that review and  
16 undertaking?

17 A. (Sprague) Yes. The Company hired Mr. Cannata to come  
18 in and do a review of our engineering and operational  
19 planning and procedures. We've had that -- that  
20 process is on ongoing. We've had many meetings with  
21 Mr. Cannata. And, my understanding is ultimately there  
22 will be a report written at the end of it that will be  
23 submitted to the Staff and the Commission.

24 MR. EPLER: Thank you. I have no

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[WITNESS PANEL: Sprague~Stachow]

1 questions, no further questions.

2 CHAIRMAN IGNATIUS: All right.

3 CMSR. SCOTT: I don't want to be out of  
4 order, out of sequence, but, before we leave that, so is  
5 there a time frame expected at this point for a report?

6 WITNESS SPRAGUE: Right now, I believe  
7 that Mr. Cannata has all the information that he needs  
8 from us. I'm not aware that there is a time that he's  
9 committed to yet.

10 CMSR. SCOTT: Thank you.

11 CHAIRMAN IGNATIUS: Thank you.

12 Mr. Epler?

13 MR. EPLER: Yes. I just raise that for  
14 the Commission just so you're aware that there is this  
15 other undertaking. It's separate and apart from this  
16 Least Cost Plan, the Least Cost Plan stands on its own.  
17 But there is this review, and just wanted to refresh the  
18 Commission's recognition of that that that's something  
19 that's pending.

20 CHAIRMAN IGNATIUS: Thank you. I  
21 appreciate that. Any questions, Ms. Amidon?

22 MS. AMIDON: Thank you.

23 BY MS. AMIDON:

24 Q. Mr. Stachow, would you please state your name for the

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1 record.

2 A. (Stachow) Leszek Stachow.

3 Q. And, would you please for the record state your  
4 employment and your position there.

5 A. (Stachow) I'm a Utility Analyst with the Electrical  
6 Division.

7 Q. Thank you. And, have you previously testified before  
8 the Commission?

9 A. (Stachow) I have.

10 Q. And, Mr. Stachow, you conducted an analysis of the  
11 Least Cost Plan filing that Unitil made in this docket,  
12 did you not?

13 A. (Stachow) I did indeed.

14 Q. And, in your review, did you find that the Least Cost  
15 Plan was adequate, in terms of the statute?

16 A. (Stachow) It met the requirements of the statute.

17 Q. And, did you participate in the Settlement Agreement?

18 A. (Stachow) I did.

19 Q. Would you please just point out to the Commission what  
20 you have -- what the Company has agreed to, at your  
21 recommendation, for future Least Cost Plan filings?

22 A. (Stachow) Yes. If I could draw the Commission's  
23 attention to Paragraph 2.2 of the "Terms of  
24 Settlement". The critical components that were of

[WITNESS PANEL: Sprague~Stachow]

1 concern to Staff was a revised description of the  
2 methodology, how distribution planning takes place; a  
3 narrative description of how the utility integrates  
4 least cost objectives into its planning process, and  
5 the requirement for a business process mapping that  
6 identifies personnel/departments' responsibility,  
7 inputs, outputs, and a calendar; and, finally, an  
8 updated assessment of demand-side energy management  
9 programs, including conservation, efficiency  
10 improvements, and load management programs.

11 MS. AMIDON: Thank you. I have no  
12 further questions.

13 CHAIRMAN IGNATIUS: All right.  
14 Ms. Chamberlin, do you have questions?

15 MS. CHAMBERLIN: I do. Thank you.

16 **CROSS-EXAMINATION**

17 BY MS. CHAMBERLIN:

18 Q. Unitil's demand-side planning document has not been  
19 updated since 2010, is that correct?

20 A. (Sprague) That is correct.

21 Q. And, are you committing in, I imagine, letter (c) to  
22 doing an update in the same manner as that planning  
23 document or do you have other ideas about how that's  
24 going to take place?

1 A. (Sprague) The way that I interpret letter (c) is that  
2 we will do a complete revision. It might have some  
3 aspects that are very similar to what was in that  
4 document from 2010. But it also might have some new  
5 technology, new programs, new ideas that may not have  
6 been looked at in 2010.

7 Q. Okay. Has the Company investigated implementing  
8 time-of-use rates for residential customers?

9 A. (Sprague) Yes, we have.

10 Q. And, is that something that you will report on in the  
11 next filing? Is that included within this description  
12 of the Settlement Agreement?

13 A. (Sprague) I would assume that, yes, time-of-use rates  
14 would be included in that type of review and document.

15 Q. And, in the past, the Company has investigated  
16 integrating distributed generation into its system. Is  
17 that also something that will be looked at in one of  
18 the future filings?

19 A. (Sprague) Could you repeat that.

20 Q. Sure. I'm wondering if -- I understand the Company has  
21 had some pilot projects. And, one of them concern  
22 integrating distributed generation into its system. Is  
23 that something you will continue to look at,  
24 re-evaluate, make new proposals? Is it something on

1 your radar screen?

2 MR. EPLER: I'm not quite sure I recall  
3 the reference that the counsel is making to our  
4 distributed generation investigation. We did -- we did  
5 have a pilot of time-of-use, and we provided a report on  
6 that. And, we also had some other proposed investments in  
7 localized energy efficiency investments, and I believe a  
8 solar installation. But those were specific. It wasn't a  
9 broad inquiry into the subject area. So, perhaps, if  
10 that's what you're referring to?

11 MS. CHAMBERLIN: I was referring to the  
12 solar installation.

13 MR. EPLER: Okay.

14 BY MS. CHAMBERLIN:

15 Q. And, simply wondering if that installation or something  
16 similar is on your radar screen for the next -- in the  
17 near future, so that it would be included in a filing?

18 A. (Sprague) At that time that we do the update, we would  
19 look to identify potential projects.

20 Q. Okay. Concerning distribution, there's a paragraph in  
21 the Settlement Agreement about assessing its  
22 distribution plans. Does that include a review for  
23 advanced meter capabilities? Or, simply a review of  
24 meters and their capabilities?

[WITNESS PANEL: Sprague~Stachow]

1 A. (Sprague) I do not believe that that was part of this  
2 discussion.

3 Q. Are you --

4 CHAIRMAN IGNATIUS: Ms. Amidon -- excuse  
5 me, Ms. Chamberlin, what section are you referring to in  
6 the Settlement Agreement?

7 MS. CHAMBERLIN: 2.2, little letter (a)  
8 says "A revised description of the methodology of how it  
9 conducts distribution planning." And, I was wondering if  
10 that included a review of how meters are selected. Do  
11 they -- does Unitil consider meters part of distribution  
12 planning?

13 CHAIRMAN IGNATIUS: Thank you.

14 **BY THE WITNESS:**

15 A. (Sprague) We don't necessarily consider our metering  
16 system with respect to distribution planning.  
17 Distribution planning is more along the lines of the  
18 capacity of the system and what the system needs in  
19 order to serve the load safely and reliably. The  
20 values or the metering data that comes out of the  
21 system is used in our distribution planning. But it's  
22 not -- distribution planning isn't or does not include  
23 an analysis of our AMI system and the functionality of  
24 the AMI system.

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1 MS. CHAMBERLIN: Okay. That's all I  
2 have.

3 CHAIRMAN IGNATIUS: Thank you.  
4 Questions from Commissioner Scott?

5 CMSR. SCOTT: Thank you. Good morning.

6 WITNESS SPRAGUE: Good morning.

7 BY CMSR. SCOTT:

8 Q. Let me start with -- again, whoever feels best, I  
9 always say that, but I don't want to not get the right  
10 answers. So, on the Settlement Agreement, I just want  
11 to make sure I understand, there were some earlier  
12 questions regarding, well, certainly, 2.2(a) talks  
13 about, for distribution planning, a more robust  
14 description of the methodology used. I was curious, is  
15 there going to be -- is that implied for the rest of  
16 (b) and (c) also, there would be more of the  
17 methodology included in those descriptions? Is that a  
18 fair assessment?

19 A. (Stachow) If I could answer that question. My  
20 understanding is that, yes, a more robust explanation  
21 would be provided. However, the objective was, from  
22 Staff's perspective, was to acquire a business process  
23 mapping diagram that would explain the whole planning  
24 process.

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1           If I can make a digression, I would say  
2           that Staff reviewed relatively detailed documentation  
3           that seemed to be responsive to the statute. However,  
4           Staff came away with a notion that the documents were a  
5           report, not necessarily how operationally the planning  
6           process would take place. Whether that's true or not  
7           perhaps is not relevant here. But the notion of having  
8           a business planning mapping process in place permits  
9           Staff, in the next review, to trace each step of the  
10          process and confirm that decisions on planning are  
11          informed by least cost considerations.

12   Q.   Thank you. And, I agree with that sentiment, by the  
13       way. So, on the same topic of methodology, I'm  
14       curious, and this is probably for Mr. Sprague, I  
15       assume, to the -- I'm just curious to understand the  
16       extent that, obviously, you're part of the CORE  
17       Programs, you participate in that. Is there -- what's  
18       the nexus between the planning process you use and the  
19       targeting that goes into, if any, of the CORE Programs,  
20       the amounts? So, what's the feedback loop there for  
21       the Company, that you have X amount of money that goes  
22       into energy efficiency programs, in the case of the  
23       CORE Programs, and is there a feedback loop, where  
24       you're looking at your future plans, the potential

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1 impacts? "Gee, it would be better to do this than  
2 that" or "Gee, it would be better if we could spend  
3 more money" or -- etcetera. How do you -- help me with  
4 that. And, that probably goes back to methodology  
5 again.

6 A. (Sprague) Sure. So, we have relatively close contact  
7 with the group at our company that runs our energy  
8 efficiency programs. We have discussions with them on  
9 general areas of the system that could or that have  
10 projects coming up in the next -- we do a five year  
11 budget forecast. And, then, the Energy Efficiency  
12 staff is able to use that as some guidance. I don't --  
13 I wouldn't say that they use it as, you know, their  
14 goal or their mission to go to these areas and, you  
15 know, really hunt out projects. But they use it as,  
16 you know, as information in developing projects with  
17 customers.

18 Q. Okay. So -- and, again, I don't want to paraphrase you  
19 incorrectly. So, with that feedback, do they attempt  
20 to target and to improve the CORE Program in that  
21 respect? Does the feedback go that way or --

22 A. (Sprague) To some extent, yes.

23 Q. Okay. That's helpful. And, on -- I know it's an old  
24 report, and there was some discussion with the Consumer



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1 Advocate regarding time-of-use, and now I'm going to --  
2 I should have marked it. In your 2010 report, I think,  
3 you discussed briefly I think a time-of-use, the  
4 pilots, I think, if I remember correctly, though I  
5 can't find it. But there was some discussion of, in  
6 the 2010 report of the demand-side report, if I  
7 remember correctly, that you've looked at that, but,  
8 effectively, the implication was it would wait till  
9 there was some change to the rate structure before that  
10 really became something you'd look at more closely.  
11 Does that sound correct?

12 A. (Sprague) Yes. In order for a time-of-use program to  
13 be successful, it really needs a strong rate structure  
14 behind it, to provide that economic incentive to modify  
15 a customer's behavior and get the savings that you  
16 really need at the times that you need it. Because,  
17 when we're talking from a planning standpoint, we, you  
18 know, we need that peak to be shifted away from those,  
19 you know, few hours or few days of the year, you know,  
20 from an engineering standpoint, that's what's most  
21 important to us. As opposed to the savings throughout  
22 the year, which is -- which, you know, helps everyone,  
23 but isn't necessarily the focus of distribution  
24 planning, *per se*.

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1 Q. So, I asked that question to ask this one. So, does  
2 the Company have a suggestion on this, this type of a  
3 rate? You know, it would be, obviously, a departure  
4 from current, but is there a suggestion out there or it  
5 was just "we'll look at this, but it doesn't make sense  
6 until that happens"?

7 A. (Sprague) I don't think we have anything developed or a  
8 straw proposal for a rate structure at this time.

9 Q. Okay. And, it sounds like you don't have a  
10 recommendation that there should be one either, it  
11 sounds like?

12 A. (Sprague) I can make arguments on both sides of it  
13 right now, so --

14 Q. I didn't want to let you off easy.

15 A. (Sprague) But a lot of states are considering it right  
16 now.

17 CMSR. SCOTT: Okay. I think I'm all  
18 set. Thank you.

19 CHAIRMAN IGNATIUS: Thank you.  
20 Commissioner Honigberg.

21 BY CMSR. HONIGBERG:

22 Q. Well, what would the argument sound like against doing  
23 that?

24 A. (Sprague) The argument against it is going back to the

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1 structure itself. If you don't have the right  
2 structure, it could ultimately lead to hurting the  
3 situation, as opposed to helping it, from a load  
4 shifting standpoint. It also can be a very expensive  
5 program to implement. Not only for the utility, but  
6 also for the customers, because the customers need to  
7 have the technology in order to take advantage of  
8 shifting their loads off the peak times. A good "for  
9 instance" is, eventually, there might become the time  
10 where your refrigerator, you could buy your  
11 refrigerator that communicates directly with some sort  
12 of pricing signal, and will take that pricing signal  
13 and decide what the refrigerator is going to do at that  
14 time. So, you might take that refrigerator, drop it  
15 down or I guess raise the thermostat a few degrees to  
16 drop the load, turn off the compressor for a couple  
17 hours of the day, might do that with your air  
18 conditioning, your pool pump. But most customers  
19 aren't at home during those times of the day to act on  
20 it themselves. So, the technology needs to be  
21 implemented in order to act on those pricing signals.

22 Q. So, that's an argument not to do it prematurely or not  
23 to do it poorly, is that right?

24 A. (Sprague) Correct.

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1 CMSR. HONIGBERG: I have nothing else.

2 BY CHAIRMAN IGNATIUS:

3 Q. A couple questions about provisions on Page 3 of the  
4 Settlement. This is in Exhibit 2. If you look at  
5 Section 2.1, it references the fact that there's  
6 discussions going on in the Legislature on the filing  
7 requirements and the filing -- timing of filings for  
8 these sorts of plans, and says "we'll let the  
9 Commission figure out what the next -- when the next  
10 LCIRP should be filed", I think, because it's -- we're  
11 in a shifting landscape right now, I take it. It says  
12 that for the Commission to decide the "timing" of the  
13 next filing. But is there also an expectation that, if  
14 the statute changes, the contents of the filing would  
15 also be changed to comply with the new statute?

16 A. (Sprague) That would be correct.

17 Q. What's the lead time that you need to produce a plan?

18 A. (Sprague) The documents that go into this plan are part  
19 of our planning process, which generally begins in the  
20 beginning of the year, say in January, December/January  
21 time frame, and goes through till the June or July time  
22 frame. So, the planning process itself is about a  
23 six-month process. Depending on the timing of the  
24 filing could depend on "do we use the most recent plans

1       that are completed or the most up-to-date plans?" So  
2       generally, I would say six months would fit it. But,  
3       if it was shorter than that, then we might use studies  
4       that -- or, "past studies", I'll call them.

5   Q.   And, the additional items that have been called out in  
6       the Agreement, the Settlement Agreement, could also be  
7       incorporated as part of -- within that six-month time  
8       frame?

9   A.   (Sprague) That would be the idea, yes.

10                   CHAIRMAN IGNATIUS: Thank you.

11       Commissioner Scott, another question?

12                   CMSR. SCOTT: Thank you.

13   BY CMSR. SCOTT:

14   Q.   The Chair's questions begged another question from me  
15       also. So, obviously, you have a legal requirement to  
16       do this LCIRP, and we try to get our benefit out of it  
17       by what you submit. Do you -- how does the Company --  
18       does the Company use the LCIRP as presented to us or do  
19       you -- how does this integrate into your planning  
20       process?

21   A.   (Sprague) Regardless of whether there was this statute  
22       or not, these are studies and documents and analysis  
23       that get done anyway. So, if the statute were to go  
24       away and not require a distribution company to file a

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1 Least Cost Integrated Resource Plan, I don't think that  
2 we'd necessarily change the way that we would plan or  
3 fund the system.

4 Q. So, what you submit to us reflects basically what  
5 you're planning anyways, is that correct?

6 A. (Sprague) Correct.

7 CMSR. SCOTT: That's good to hear.  
8 That's all I had. Thank you.

9 CHAIRMAN IGNATIUS: Thank you. Any  
10 redirect, Mr. Epler?

11 MR. EPLER: Excuse me. No thank you.

12 CHAIRMAN IGNATIUS: Ms. Amidon?

13 MS. AMIDON: No thank you.

14 CHAIRMAN IGNATIUS: All right. Then,  
15 the witnesses are excused. Thank you very much.

16 Is there any objection to striking the  
17 identification on Exhibits 1 and 2 and make them full  
18 exhibits?

19 (No verbal response)

20 CHAIRMAN IGNATIUS: Hearing none, we  
21 will do that. Anything else, before we take up closing  
22 comments?

23 (No verbal response)

24 CHAIRMAN IGNATIUS: Then, let's start

1 with Ms. Chamberlin please.

2 MS. CHAMBERLIN: Thank you. The  
3 Consumer Advocate Office is looking for ways to increase  
4 options for residential customers, in terms of energy  
5 efficiency, technology, conservation. And, I'm looking  
6 for ways to identify whatever barriers there may be. And,  
7 my questions were getting at this, you know, using this  
8 process to identify those barriers. And, knowing that  
9 Unitil in the past has done various pilot programs, I'm  
10 looking to push them to continue that innovation and  
11 continue that process. And, knowing that the Commission  
12 is sensitive to making requirements that don't really help  
13 them do that, I don't want to do that either. And, so,  
14 I'm trying to look at ways to encourage it from the bottom  
15 up, to have the utility really show us what they're  
16 capable of, and so that we can continue to move forward.  
17 It may be that the cost is prohibitive at this point, but,  
18 you know, down the road it may not be. And, if we don't  
19 start at least the discussion, we will never -- we will  
20 never get there.

21 So, I believe that the process can be  
22 useful for identifying barriers, and removing them to the  
23 full extent that we can. And, that's really where I was  
24 headed in my cross-examination.

1 CHAIRMAN IGNATIUS: Do you have a  
2 position on the Plan as filed or the Settlement Agreement?

3 MS. CHAMBERLIN: I don't have a  
4 position. Simply, the Plan met the minimum terms of the  
5 statute. It's not doing enough, in my view, to promote  
6 innovation. And, exactly how that can be better done, I'm  
7 certainly still working on, and expect that others are as  
8 well.

9 CHAIRMAN IGNATIUS: Thank you.  
10 Ms. Amidon.

11 MS. AMIDON: Thank you. Staff conducted  
12 a thorough review of the Least Cost Plan submitted by  
13 Unitil. And, we've determined, upon that review, that it  
14 is adequate and should be accepted by the Commission as  
15 meeting the statutory requirements. And, we also,  
16 obviously, support the Settlement Agreement and ask that  
17 the Commission approve that within its order on the Least  
18 Cost Plan. Thank you.

19 CHAIRMAN IGNATIUS: Thank you.  
20 Mr. Epler.

21 MR. EPLER: Yes. Thank you. Just in  
22 terms of closing specifically, we just feel that -- the  
23 Company feels that it met the requirements of the statute  
24 with its Plan, and we ask the Commission to approve the



1 Settlement Agreement.

2 I'd like to just respond to a couple of  
3 the comments that were made by the Office of Consumer  
4 Advocate, and I think also address a couple of questions  
5 that came from the Bench. Sometimes I think some of the  
6 activities that the Company has undertaken aren't  
7 necessarily reflected or don't sometimes fit into a report  
8 format. So, sometimes you may not get the full breadth of  
9 the activities that the Company is engaged in. And, it  
10 has done some things in different forums that, again,  
11 aren't necessarily reflected in the report. We have moved  
12 ahead, for example, with an AMI, an Automated Metering  
13 Infrastructure, and we were one of the first companies in  
14 the New England region to do that. And, we continue to  
15 innovate and to take advantage of upgrades to that system,  
16 and it's giving us a number of advanced capabilities.

17 We're also, as the Commission may be  
18 aware, our affiliated company, electric distribution  
19 company in Massachusetts is engaged in an investigation  
20 that the Department of Public Utilities is undertaking on  
21 grid modernization. And, we have informally shared with  
22 the Staff and the Consumer Advocate's Office the comments  
23 that the company filed and have provided them access to  
24 the transcripts of the hearings that occurred. And, we're

1 a small enough company that, when we undertake things for  
2 one entity, that there's cross-pollination that occurs in  
3 our other systems. So, certainly anything that we'll be  
4 doing there may well be reflected up here.

5 And, we're certainly available to meet  
6 informally with either the Staff or the OCA to discuss  
7 some of those, some of those activities. So, we are  
8 available.

9 And, I think, perhaps some of the things  
10 that the Staff was asking us to do in our report may, in  
11 the next report filed, try to bring in some more of those  
12 other activities, rather than I think the more traditional  
13 format and content of this report. So, we'd be happy to  
14 do that.

15 CHAIRMAN IGNATIUS: Thank you. I  
16 appreciate the extra information. We will take all of  
17 this under advisement and watch for the legislative action  
18 on the filing requirements, and issue an order, or it may  
19 be multiple orders, in light of the legislative changes,  
20 as soon as we can. Thank you. We're adjourned.

21 **(Whereupon the hearing was adjourned at**  
22 **10:42 a.m.)**  
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