



January 27, 2017

Debra A. Howland
Executive Director and Secretary
N.H. Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, N.H. 03301

NHPUC 27 JAN 17 PM 1:48

RE: **DRM 16-853: Puc 2000 Rules**
 Comments of Unitil Energy Systems, Inc.

Dear Ms. Howland,

Unitil Energy Systems, Inc. ("Unitil" or the "Company") hereby submits, pursuant to the Public Utility Commission's Order of Notice dated December 27, 2017, the Company's written comments regarding the proposed readoption and amendment of the Puc 2000 rules.

Unitil generally supports the proposed amendments and additions to the Puc 2000 rules, and does not suggest or recommend any further revision to the draft issued by the Commission. In particular, the Company supports the adoption of the amended Puc 2004.12 ("Off-Cycle Meter Reading") without further revision. The amended rule, as drafted, clearly defines the circumstances under which a CEPS may request an off-cycle meter reading, as well as the rights and obligations of a CEPS and a utility relative to such a request.

At the public hearing on January 19, 2017, at least one party proposed that the Commission expand the circumstances under which off-cycle meter readings may be requested and amend Puc 2004.10 to allow for the off-cycle "on-boarding" of newly enrolled customers. Any such revision would result in significantly increased and unnecessary administrative burdens for the State's electric utilities. The procedure as currently proposed, whereby enrollments become effective for a customer's scheduled read date following at least two days' EDI notification to the utility by the CEPS, is fair to all parties and need not be disturbed.

To the extent that parties suggest the addition of new rules that would impose new obligations upon electric utilities, as some parties did at the January 19, 2017 public hearing, Unitil strongly opposes any such additions. The purpose of the amended Puc 2000 rules is to

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establish requirements for the registration of competitive electric power suppliers and aggregators with the Public Utilities Commission, as well as certain consumer protection requirements and enforcement provisions and procedures relative to suppliers and aggregators. Utilities are expressly exempt from the application of the Puc 2000 rules. Puc 2001.02(b) (in both currently effective and proposed form).

Unitil appreciates the opportunity to provide these comments and participate in this rulemaking proceeding. Please do not hesitate to contact me should you have any questions regarding the Company's comments.

Regards,

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