

**THE STATE OF NEW HAMPSHIRE  
BEFORE THE  
PUBLIC UTILITIES COMMISSION**

**DE 21-030**

**UNITIL ENERGY SYSTEMS, INC.**

**EXPEDITED MOTION FOR CLARIFICATION**

Unitil Energy Systems, Inc. (“UES” or the “Company”) hereby respectfully moves the Commission, pursuant to Puc 203.07 and RSA 541:3 for expedited clarification of Order No. 26,623 issued on May 3, 2022 in the above-referenced docket. In support of this motion, UES states:

1. On February 11, 2022, UES, the Department of Energy, the Office of the Consumer Advocate, Clean Energy New Hampshire, the Department of Environmental Services, and ChargePoint, Inc. (collectively, the “Settling Parties”) submitted a comprehensive Settlement Agreement to the Commission proposing, among other things, an increase of \$6,326,330 in the Company’s distribution revenues and the establishment of an Arrearage Management Program (“AMP”). Order No. 26,623 at 5, 14 (May 3, 2022).

2. In the Settlement Agreement, the Settling Parties agreed that the Company’s base rates would include \$440,118 in annual revenue attributable to the implementation of the AMP, including an allocated full-time employee cost of \$65,118 and annual AMP forgiveness of \$375,000. Hearing Exhibit 12 (Settlement Agreement and Attachments) at Bates 000018, 000055; see also Order No. 26,623 at 14.

3. In Order No. 26,623, the Commission approved the proposed revenue requirement increase of \$6,326,330. Order No. 26,623 at 32. However, the Commission declined to

approve the AMP. Id. at 29-30. As such, the approved increase in base rates of \$6,326,330 includes \$440,118 for a program that the Commission has not approved.

4. Removing the \$440,118 from the approved revenue requirement results in a revenue requirement of \$5,883,395.<sup>1</sup> See Attachment 1 (revised Schedule RevReq-1 accounting for the removal of the AMP funding).

5. It is UES's belief that the Commission did not intend to leave the \$440,118 in funding for the AMP program in the Company's approved revenue requirement. As such, UES requests that the Commission clarify Order No. 26,623 to approve a revenue requirement of \$5,883,395.

6. The Company must file tariffs confirming to Order No. 26,623 within fifteen (15) days of the date of the Order (i.e., May 18, 2022) pursuant to Puc 1603.02(b). Order No. 26,623 at 33.

7. Moreover, the Commission authorized the Company to file for recovery of step increases as provided in the Settlement Agreement, subject to further review, hearing, and determination by the Commission for effect on June 1, 2022 and June 1, 2023. Id. UES made its first step adjustment filing on February 28, 2022, and the Commission has scheduled a hearing on the Company's filing for May 17, 2022 in Docket DE 22-026. The Company must update certain schedules in advance of the hearing to reflect the revenue requirement approved by the Commission.

8. Due to the impending May 17, 2022 hearing in DE 22-026 and the deadline to make a compliance tariff filing on May 18, 2022, the Company respectfully requests that the

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<sup>1</sup> Removing the \$440,118 also results in a decrease to the revenue requirement of an additional \$2,817 associated with a reduction in bad debt expense.

Commission clarify Order No. 26,623 to approve a revenue requirement of \$5,883,395 on an expedited basis.

9. By filing this expedited motion for clarification of Order No. 26,623 on the discrete issue described above, the Company does not waive its right to file additional motions for rehearing and / or clarification on other issues within the time period prescribed in RSA 541:3.

10. UES contacted the DOE and OCA in advance of filing this motion, and they assent to the relief requested herein.

WHEREFORE, UES respectfully requests that the Commission:

A. Clarify Order No. 26,623 to approve a revenue requirement of \$5,883,395, reflecting the removal of \$440,118 related to the funding of the proposed AMP program; and

B. Grant such further relief as may be just and appropriate.

Respectfully submitted

UNITIL ENERGY SYSTEMS, INC.

By its Attorney:



Dated: May 10, 2022

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**Certificate of Service**

I hereby certify that on May 10, 2022, a copy of the foregoing Motion was electronically served upon the Service List.

A handwritten signature in black ink, appearing to read 'Patrick H. Taylor', written over a horizontal line.

Patrick H. Taylor