



December 22, 2023

Daniel Goldner, Chairman
New Hampshire Public Utilities Commission
21 S. Fruit St., Suite 10
Concord, New Hampshire 03301

RE: Northern Utilities, Inc., Docket No. DG 23-086, Revenue Decoupling Adjustment Factor- Request for Additional Time to Conduct Discovery and Submit Rebuttal

Chairman Goldner,

On September 15, 2023, Northern Utilities, Inc. (“Unitil” or the “Company”) filed, pursuant to Order No. 26,650 (DG 21-104) and NHPUC No. 12 – Gas First Revised Pages 163-168, its Petition for approval of the Company’s proposed Revenue Decoupling Adjustment Factor for effect November 1, 2023. Notwithstanding the fact that the parties to DG 21-104 agreed on a process in which the Company would make a filing on September 15 for rates effective November 1, and that the Company submitted its filing consistent with the terms of the DG 21-104 Settlement Agreement and the applicable Commission-approved tariff, Unitil assented to the Department of Energy’s October 10, 2023 request for additional time to conduct discovery on the Company’s filing.

On October 18, 2023, the Commission directed the Department to file a position statement on the Company’s filing by November 9, 2023. On November 9, the Department submitted a partially assented-to procedural schedule incorporating several rounds of discovery and a technical session. Pursuant to the Procedural Schedule, which was subsequently approved by the Commission, the Department was required to submit a Technical Statement or Testimony by December 8, 2023, and the Company had the opportunity to file Rebuttal Testimony or Technical Statement by today, December 22, 2023.

On December 8, 2023, the Department submitted a Technical Statement to the Commission. While the Technical Statement included, among other things, a summary of what the Department deems to be relevant facts and a section of DOE observations, the Department declined to offer a position on the Company’s filing, stating instead that its

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“current position and recommendation is that the Commission review and continue its conditional approval of Northern’s capped RDAF claim . . . subject to: the pending discoveries from Northern; and future updated filing to be submitted by the Department upon review of . . . pending information.” The Procedural Schedule proposed by the Department and approved by the Commission did not contemplate additional time for the Department to file a supplemental technical statement or “updated filing.”

Following submission of the Department’s Technical Statement, the Company timely responded to a set of Technical Session requests on December 11, 2023. The Company also responded to the Department’s Third Set of Data Requests on December 11, 2023, approximately one week before they were due.

As of this writing, the Department has not submitted a supplemental Technical Statement or “updated filing” providing the Department’s conclusions and recommendations regarding the Company’s filing. As such, for reasons beyond the Company’s control, the Company is not able to provide rebuttal testimony or a rebuttal technical statement today. Unitil understands that the Department may seek an additional amendment to the procedural schedule. To the extent that the Department is permitted to submit a supplemental Technical Statement or updated filing, the Company requests that it be granted at least as much time to conduct discovery and submit rebuttal as is currently allowed in the Procedural Schedule. To the extent that the Commission declines to allow the Department to submit additional material, the Company requests at least five business days from the date of the Commission’s decision to respond to the Technical Statement that is currently in the record.

Thank you for your assistance with this matter.

Regards,

A handwritten signature in black ink, appearing to read "Patrick H. Taylor", written in a cursive style.

Patrick H. Taylor