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April 3, 2023

Daniel C. Goldner, Chairman
New Hampshire Public Utilities Commission
21 South Fruit Street
Concord, New Hampshire 03301

Re: Docket No. DE 22-083
Unitil Energy Systems, Inc.
Proposed Light Emitting Diode Outdoor Lighting Service Tariff Changes

Department of Energy Position on Tariff

Dear Chairman Goldner:

On November 3, 2022, Unitil Energy Systems, Inc. (Unitil) filed a Proposed Light Emitting Diode Outdoor Lighting Service Tariff (Tariff).

On February 17, 2023, the Commission issued a procedural order, directing Unitil to respond to certain record requests by March 1, 2023, and requesting the Department of Energy (DOE) to provide its position on the proposed Tariff no later than March 15, 2023.

Unitil filed responses with the Commission on March 1, 2023. On March 6, 2023, the DOE requested an extension for the filing of its position to April 1, 2023. The Commission issued a procedural order on March 8, 2023, granting DOE an extension to April 3, 2023.

On April 3, 2023, Unitil filed a revised version of the proposed Tariff.

Please find enclosed the DOE's technical statement with its position on the proposed Tariff.

Thank you for your assistance in this matter.

Respectfully,

/s/ Suzanne Amidon

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STATE OF NEW HAMPSHIRE
BEFORE THE
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

Docket No. DE 22-083

Unitil Energy Systems, Inc.
Proposed Light Emitting Diode Outdoor Lighting Service Tariff Changes

Technical Statement of Elizabeth R. Nixon
New Hampshire Department of Energy, Division of Regulatory Support

April 3, 2023

Summary

On November 3, 2022, Unitil Energy Systems, Inc (Unitil) filed proposed tariff changes in accordance with a Settlement Agreement in DE 21-030, approved in part on May 3, 2022 by Order No. 26,623. The Settlement Agreement required Unitil to file new or revised outdoor lighting tariffs, similar to Liberty Utilities' and Eversource Energy's, "to allow municipalities to install advanced lighting controls and to allow municipalities to own and maintain lighting fixtures." On April 3, 2023, Unitil filed a revised tariff after discussions between Unitil and the New Hampshire Department of Energy (DOE). DOE recommends approval of the proposed tariff changes as filed by Unitil on April 3, 2023.

Background

In the Settlement Agreement filed on February 11, 2022 in Docket DE 21-030, Request for Change in Rates, the parties agreed to the following regarding Unitil's light emitting diode (LED) outdoor lighting tariffs:

Within six months of the Commission's approval of this Settlement Agreement, Unitil shall file a new or revised LED Outdoor Lighting Service tariff, which will align more closely with Liberty Utilities LED-2 tariff and Eversource's EOL tariff rate to allow options for municipalities to install advanced lighting controls and to allow municipalities to own and maintain lighting fixtures.

The Settlement Agreement was approved in part by Order No. 26,623, dated May 3, 2022. Within six months of approval of the Settlement Agreement, on November 3, 2022, Unitil filed new and revised tariffs for LED outdoor lighting to address the agreed to changes. Unitil revised Schedule LED, renamed to LED-1, to include advanced lighting controls. Schedule LED-1 allows for customers to pay for the fixtures and installations of LED lights, but not own the

lighting, and was revised to allow customers to use advanced lighting controls. New Schedule LED-2 is based on Schedule LED-1, and allows for governmental bodies to own and provide the maintenance for LED lighting fixtures and also have the option of installing and using advanced lighting controls.

As noted in record request responses filed by Unitil on March 1, 2023, Unitil's proposed Schedules LED-1 and LED-2 differ somewhat from Liberty's and Eversource's LED outdoor lighting tariffs. DOE believes that these tariffs of the three companies do not need to be identical, because each company has unique circumstances which may need to be handled differently. The intent of the Settlement Agreement was to have the three companies have tariff provisions which allow for the usage of advance lighting controls for LED outdoor lighting for all customers and for governmental customers, allow for ownership and maintenance of LED outdoor lighting.

In discussion between DOE and Unitil, DOE suggested that Unitil ensure that the line extension policy be revised to accommodate these new/revised tariffs. In Unitil's April 3, 2023 filing, Unitil included additional revisions to its tariff to address this issue. According to Unitil, the proposed effective date of these tariff changes is August 1, 2023 to allow for accommodations to the billing system for these new tariffs/provisions.

Recommendation

DOE has reviewed Unitil's initial and revised filings consisting of proposed tariff changes and supporting testimony. Based on these filings, DOE believes that these proposed tariff changes meet the requirements of the provision in the Settlement Agreement. Therefore, DOE recommends approval of these proposed tariff changes as filed on April 3, 2023.