

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

UNITIL ENERGY SYSTEMS, INC.

**Docket No. DE 23-002
Proposed Purchase of Receivables Program**

ASSENTED-TO MOTION FOR CONTINUANCE

Unitil Energy Systems, Inc. (“Unitil” or the “Company”) respectfully requests, pursuant to Puc 203.07, that the New Hampshire Public Utilities Commission (the “Commission”) continue the hearing in this matter scheduled for October 23, 2024. The requested continuance will afford the Company, the parties to this proceeding (the Department of Energy (“Department”), the NRG Retail Companies, Inc. (“NRG”), and the Community Power Coalition of New Hampshire (“CPCNH”), as well as Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource”) and Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty (“Liberty”) time to work toward consistent revisions to the terms and conditions necessary to implement the Purchase of Receivable (“POR”) Programs. In support of this Motion, Unitil states as follows:

1. On August 7, 2024, the Commission issued a Supplemental Order of Notice directing the Company to file proposed revisions to its Competitive Electric Supplier Trading Partner Agreement (“TPA”) and Terms and Conditions for Competitive Suppliers (“T&C”) tariff. The Supplemental Order further directed the Department and other parties to file their positions regarding Unitil’s proposed revised TPA and proposed revised T&C tariff. The Commission issued substantially the same Supplemental Orders of Notice in the Eversource (DE 23-004) and Liberty (DE 23-003) proceedings.

2. The Company filed proposed revisions to its TPA and T&C tariff on August 23,

2024 in DE 23-002, Eversource filed proposed revisions on September 23, 2024 in DE 23-004, and Liberty filed proposed revisions in DE 23-003 on September 24, 2024. The Department, CPCNH, and NRG filed their positions on the proposed revisions on September 18, 2024 in DE 23-002, October 8, 2024 in DE 23-004, and October 8, 2024 in DE 23-003.

3. The comments filed by the Department, CPCNH, and NRG in the Eversource (DE 23-004) and Liberty (DE 23-003) proceedings note that there are inconsistencies among the revisions proposed by Unitil, Liberty, and Eversource and urge the Commission to require consistency where practicable. CPCNH Comments, DE 23-004 (Oct. 8, 2024) at 3-4 (Docket Book Tab 46); Department's Position Statement, DE 23-004 (Oct. 8, 2024) at 4 (Docket Book Tab 47); NRG Comments, DE 23-003 (Oct. 8, 2024) at 3-5 (Docket Book Tab 48); CPCNH Comments, DE 23-003 (Oct. 8, 2024) at 3-4 (Docket Book Tab 44); Department's Position Statement, DE 23-003 (Oct. 8, 2024) at 2 (Docket Book Tab 45); NRG Comments, DE 23-003 (Oct. 8, 2024) at 6-8 (Docket Book Tab 46).

4. Unitil has conferred with Liberty, Eversource, the Department, CPCNH, and NRG and agrees that there is a benefit to exploring consistent terms and agreements for implementing the POR programs where practicable. These collaborative discussions may limit the issues in dispute across all three POR dockets, which serves the interest of administrative efficiency. Accordingly, Unitil requests the Commission continue the hearing scheduled for October 23, 2024 until a date in mid-December to allow these collaborative discussions to occur.

5. The Department, CPCNH, and NRG have assented to this Motion. Unitil, the Department, CPCNH, and NRG propose to provide the Commission with an update on the status of these collaborative discussion on or before November 15, 2024.

WHEREFORE, Unitil respectfully requests that the Commission grant this Motion for Continuance for the reasons stated herein.

Respectfully Submitted,
UNITIL ENERGY SYSTEMS, INC.
By:

A handwritten signature in black ink that reads "Matthew Campbell". The signature is written in a cursive style with a horizontal line underneath it.

Matthew C. Campbell
Unitil Service Corp
6 Liberty Lane West
Hampton, NH 03842
603-773-6543
campbellm@unitil.com

Dated: October 16, 2024

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of October, 2024, a copy of the foregoing Motion was electronically delivered to the Service List in docket DE 23-002.

A handwritten signature in black ink that reads "Matthew Campbell". The signature is written in a cursive style with a large initial "M" and a long, sweeping underline.

Matthew C. Campbell