BEFORE THE NEW HAMPSHIRE

PUBLIC UTILITIES COMMISSION

UNITIL ENERGY SYSTEMS, INC. 2026 DEFAULT SERVICE SOLICITATIONS	: : :	DOCKET NO. DE 26-024

RETAIL ENERGY SUPPLY ASSOCIATION
PETITION TO INTERVENE

Pursuant to New Hampshire Revised Statutes Annotated 541-A:32 and New Hampshire Administrative Rules Puc 204.08, the Retail Energy Supply Association ("RESA")[1] with an address at 7159 Red Top Road, Hummelstown, PA 17036 hereby petitions the New Hampshire Public Utilities Commission ("Commission") to intervene in the above-captioned proceeding. In support of this Petition, RESA states the following:

INTRODUCTION

1. On July 29, 2026, the Commission issued a Supplemental Order of Notice opening a further phase of the above-captioned proceeding to examine: (1) the methodology for developing the proxy price applied to the ISO-New England market-based procurement component for Unitil Energy Systems, Inc. Default Service customers; and (2) the frequency of the reconciliation of Default Service over- and under-recoveries.[2]

2. The Supplemental Notice directed anyone seeking to intervene in the proceeding to do so by August 14, 2026.[3]

[1] The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

[2] *See generally*, Supplemental Order of Notice (Jul. 29, 2026) ("Supplemental Notice").

[3] *Id.* at 4.

3. RESA now hereby petitions to intervene in the proceeding.

STANDARD

4. "The [C]ommission shall rule on petitions to intervene in accordance with the standards of RSA 541-A:32."[4]

5. The Commission must grant a petition to intervene if: (a) the petition describes how the petitioner is substantially affected by a proceeding; and (b) the intervention would be in the interests of justice and not impair the orderly conduct of the proceeding.[5]

6. In addition, the Commission also has the discretion to grant a petition to intervene "upon determining that such intervention would be in the interests of justice and would not impair the orderly and prompt conduct of the proceedings."[6]

INTERVENTION REQUEST

7. The pricing of Default Service has a direct and substantial effect on the competitive retail energy market.[7] Moreover, the 1996 Electric Utility Restructuring Act[8] recognizes that "[c]ompetitive markets should provide electricity suppliers with incentives to operate efficiently and cleanly, open markets for new and improved technologies, provide electricity buyers and sellers with ***appropriate price signals***, and improve public confidence in the electric utility industry."[9]

8. Reconciliations distort the relationship between the actual cost of providing Default Service during a particular period and the market price of power. Inaccuracies in and

[4] N.H. Admin. Rules Puc 204.08.
[5] RSA 541-A:32,I.
[6] RSA 541-A:32,II.
[7] *Cf.* RSA 374-F:3,V(e) (requiring consideration of harm to competitive markets).
[8] RSA 374-F ("Restructuring Act").
[9] RSA 374-F:1,II (emphasis added).

deferrals of those reconciliations exacerbate this distortion. As a consequence, customers do not receive "clear price information" as required by the Restructuring Act.[10]

9. Without clear and accurate price signals, customers cannot make informed decisions about the value of competitive supply options; thereby, harming the continued development and sustainability of the competitive retail electric market in New Hampshire.

10. RESA is a non-profit organization and trade association that represents the interests of its members in regulatory proceedings in the Mid-Atlantic, Great Lakes, New York, and New England regions. RESA members are active participants in the retail competitive markets for energy, including the New Hampshire retail energy market. Several RESA member companies are licensed to serve customers in New Hampshire and are presently providing service to New Hampshire customers. As such, RESA and its members have a substantial and specific interest in ensuring that the outcome of this proceeding does not negatively impact the continued development of retail competitive markets in New Hampshire.

11. In addition, RESA's participation in this proceeding would be in the interests of justice. Because of the diversity of its members, their business models and the jurisdictions in which they do business, RESA has unique perspectives that no other participant in this proceeding can replicate and that will aid the Commission in its investigation.

12. RESA's participation will not impair the orderly conduct of the proceeding. In fact, RESA's participation in this docket will conserve resources for the Commission and the parties to the proceeding that might otherwise have to respond to participation by multiple individual RESA member companies. To the extent that RESA members participate individually

[10] RSA 374-F:3,III (requiring that unbundled rates "provide customers clear price information on the cost components of generation, transmission, distribution, and any other ancillary charges").

in this docket, RESA will seek to coordinate its presentations with its members so as to avoid unnecessary duplication.

13. RESA has not yet determined the extent of its expected participation and reserves the right to fully participate in this docket, including without limitation, through comments, motion practice, and briefs.

CONCLUSION

For all the foregoing reasons, the Commission should grant RESA's petition to intervene in this proceeding.

Dated: August 14, 2026

Respectfully submitted,
RETAIL ENERGY SUPPLY ASSOCIATION

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CERTIFICATION

I hereby certify that a copy of this Petition to Intervene has this day been sent to all participants and parties on the docket service list.



Joey Lee Miranda

Dated: August 14, 2026