

STATE OF NEW HAMPSHIRE

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January 28, 2020

Attn: Carole Ann Howe
Pennichuck East Utility, Inc.
25 Manchester St.
Merrimack, NH 03054

RE: Docket No. DW 19-035 PEU QCPAC Compliance Tariff Filing - Pages 50 – 53.
NHPUC No. 1 – WATER

Dear Ms. Howe:

Staff reviewed the PEU QCPAC Compliance Tariff filing received on January 24, 2020 in the above-captioned proceeding.

The recently submitted Tariff does not appear to comply with the Commission's Rules. Specifically, Staff cites PUC 1603.06(o) Page Designations, Tariff Revisions. The Company's Compliance Tariff filing for pages 50-53 cites the incorrect approving Order for the tariff pages. The approving Order for the 2019 PEU QCPAC is Order No. 26,313 (December 6, 2019) in Docket No. DW 19-035.

If you have any questions, please contact me at (603) 271-4081 or via e-mail at anthony.leone@puc.nh.gov.

Thank you,

A handwritten signature in black ink, appearing to read "Anthony J. Leone".

Anthony J. Leone
Utility Analyst, Gas/Water Division

QUALIFIED CAPITAL PROJECT ADJUSTMENT CHARGE

In addition to the net charges provided for in this Tariff, a Qualified Capital Project Adjustment Charge ("QCPAC") surcharge of 2.98% will apply on a service rendered basis to all bills issued after July 22, 2019.

I. General Description

Purpose: To recover the fixed costs (1.1 times principal and interest plus property taxes) of Commission-approved capital expenditures needed to operate maintain, insure regulatory compliance and to replace aging infrastructure which were completed and placed in service and to be recorded in the individual accounts, as noted below, between base rate cases. In addition, QCPAC provides the Company with the resources to complete essential asset replacement for infrastructure for the purpose of improving or protecting water quality and the reliability of service and to comply with evolving regulatory requirements imposed by the Safe Drinking Water Act.

QCPAC Eligible Property will encompass all Assets acquired by the Company as part of its annual capital improvements plan. Any regulatory asset that is recovered through an amortization expense is not eligible for QCPAC treatment.

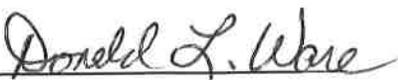
Computation of the QCPAC

The charge effective for all bills issued after July 22, 2019 will be calculated to recover the fixed costs of eligible plant additions not previously reflected in the Company's rate base and placed in service between January 1, 2018 and December 31, 2018. Thereafter, the QCPAC will be updated on an annual basis to reflect eligible plant additions placed in service during the prior calendar year. Thus, changes in the QCPAC surcharge percentage will occur as follows:

<u>Effective Date of QCPAC Change</u>	<u>Date To Which QCPAC Eligible Plant Additions Reflected</u>
July 22, 2019	December 31, 2018

The QCPAC will be applied on a service rendered basis to all bills rendered after July 22, 2019. The QCPAC will be applied uniformly to all customer classes and charges with the exception that the QCPAC will not be applied against the North Country Capital Recovery Surcharge.

Issued: January 16, 2020
Effective: July 22, 2019

Issued by: 
Name: Donald L. Ware
Title: Chief Operating Officer

The fixed costs of eligible infrastructure system improvement projects will consist of principal and interest payments and property taxes calculated as follows:

Principal and Interest: The principal and interest expense will be based on the annual principal and interest associated with the financings received the Drinking Water and Groundwater Trust Fund, the New Hampshire Department of Environmental Services State Revolving Loan Fund and a term loan with CoBank, all of which were closed on before or on July 22, 2019 to pay for the QCPAC qualified projects that were completed and used in useful by December 31, 2018. The Principal and interest associated with these various financings will be multiplied by 1.1 to determine this portion of the QCPAC surcharge. The revenues collected via the QCPAC surcharge shall be divided into two revenue streams with the revenues associated with 1.0 times the QCPAC principal and interest being part of the Company's Debt Service Revenue Requirement ("DSRR") and the revenues associated with 0.1 times the QCPAC principal and interest being part of the Company's 0.1 Debt Service Revenue Requirement ("0.1 DSRR").

Property Taxes: Incremental property taxes associated with the specific capital projects, as determined in the year of the granting of the QCPAC for such projects. The property tax expense will reflect an estimate of the tax expense for such projects based on the tax rate then in effect at the end of the year the QCP was used and useful times the final audited cost of the eligible QCP's.

QCPAC Surcharge Amount: The charge will be expressed as a percentage carried to two decimal places and will be applied to the effective portion of the total amount billed to each customer under the Company's otherwise applicable rates and charges.

The QCPAC Surcharge Amount approved by the Commission will be recouped back to the effective date of this tariff. The recoupment will be calculated based on actual charges incurred between the effective date of this tariff July 22, 2019 and the effective date of the order, January 6, 2020 and shall be collected over two months commencing after the issuance date of this tariff.

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Formula: The formula for calculation of the QCPAC surcharge is as follows:

$$\text{QCPAC} = \frac{1.1 \times (\text{AP} + \text{AI}) + \text{PT}}{\text{BRWR}}$$

Where:

AP = the annual principal payments associated with the financings issued to fund QCPAC eligible projects that were used and useful before the end of the preceding year.

AI = the annual interest payments associated with the financings issued to fund QCPAC eligible projects that were used and useful before the end of the preceding year the pre-tax return rate applicable to eligible infrastructure system improvement projects.

PT = annual property taxes related to eligible infrastructure system improvement projects.

BRWR= base retail water revenues as approved by the Commission in the Company's last rate proceeding, DW 17-128, or a subsequent docket.

Annual updates: Supporting data for each annual update will be filed with the Commission and the Office of Consumer Advocate no later than February 15th of each year.

Audits: The QCPAC will be subject to audit prior to the determination by the Commission.

New Base Rates: The QCPAC charge will be reset at zero as of the effective date of new base rates that provide for prospective recovery of the annual costs that had theretofore been recovered under the QCPAC. Thereafter, only the fixed costs of new eligible plant additions that have not previously been reflected in the Company's rate base would be reflected in the annual updates of the QCPAC.

Issued: January 16, 2020

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Issued by:



Name: Donald L. Ware

Title: Chief Operating Officer

Customer Notice: At least thirty (30) days in advance of a QCPAC filing, the Company will notify Customers of the filing by including an explanatory bill insert with the bills. Before sending, the Company will review the notice with the Commission's Consumer Services and External Affairs division. Customers shall also be notified of changes in the QCPAC by including appropriate information with the first bill they receive following any change.

Notice of Project Substitution: If, after the Company has received Commission approval for Year 1 QCPAC projects, because of changed circumstances or significant new information the Company plans to undertake projects in Year 1 that were not included on the list of approved QCPAC projects for that year or it has decided not to proceed with one or more projects that were included on the Commission-approved list, it shall notify the Commission and all parties to the proceeding in which the list of QCPAC projects was approved that the Company plans to add to or delete projects and the reason for the proposed changes, in accordance with the following schedule. The Company will submit updates for approved QCPAC projects for that year, based upon information known on a year-to-date basis, from the beginning of the year through the following effective dates, on the associated reporting dates:

Effective Date

June 30
September 30
November 30

Reporting Date

August 15
November 15
January 15

Issued: January 16, 2020
Effective: July 22, 2019

Issued by: Donald L. Ware
Name: Donald L. Ware
Title: Chief Operating Officer

CANCELLING PAGE

Issued: November 27, 2013

Issued by Donald L. Ware

Effective: November 27, 2013

Title: Chief Operating Officer

Authorized by NHPUC Order No. 25,602 in Docket No. DW 13-126, dated November 27, 2013

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