

June 13, 2022

## **BY E-MAIL**

Daniel Goldner, Chair New Hampshire Public Utilities Commission 21 S. Fruit Street, Suite 10 Concord, NH 03301-2429

Re: DG 21-131, Northern Utilities, Inc.

June 2022 Monthly Cost of Gas Report and Motion for Amendment to Cost of Gas Rate

## Dear Chair Goldner:

Pursuant to Order Nos. 26,539 (October 29, 2021), 26,626 (May 12, 2022), and 26,627 (May 17, 2022) in Docket No. DG 21-131, enclosed is Northern Utilities - New Hampshire Division's ("Northern" or the "Company") current calculation of its projected over or under-collection of gas costs and amended cost of gas ("COG") rate filing for the 2021-2022 summer season.

The current calculation for the 2022 summer season, which reflects NYMEX futures prices as of June 10, 2022, produces an anticipated material under-recovery of gas costs. As indicated in Northern's April 2022 Monthly Report, and as discussed in Northern's May 10, 2022 motion in this docket, COG rates had been increased by their maximum level of 25 percent as authorized by the Commission in Order No. 26,539. Further, the COG rate has, as of June 1, 2022, been amended to reflect the continuing rise in NYMEX prices as were known in May 2022.

Due to continuation of the high NYMEX prices and to address the material undercollection, in this filing Northern is requesting that the Commission authorize an additional increase the COG rate above the level allowed by Order No. 26,626 and capped by Order No. 26,627, for effect on July 1, 2022. This proposed increase is predominantly due to continuing increases in NYMEX natural gas prices. Northern is proposing to increase its summer period cost COG rates to reflect an increase in the projected cost of gas of \$1,060,472. Further, Northern is requesting that the Commission reinstate the authorization to further adjust the COG rate within a specified bandwidth that had been the prior practice of the Commission and which is specified in Northern's tariff.

As shown in the included COG model (see Cell H54 of the Tab labeled "Attachment 1"), the amount of the increase calculated to address the under-collection is \$0.1847 per therm. That amount is added equally to each of the presently authorized rates as show in the attached revisions to Page 43 of Northern's tariff. For ease of reference, the proposed adjustments are shown below:

RATE CLASS	CURRENT COG RATE (\$ per therm)	PROPOSED ADJUSTMENT (\$/therm)	PROPOSED COG RATE (\$ per therm)
Residential	0.9126	0.1847	1.0973
C&I Low Winter Use	0.8690	0.1847	1.0537
C&I High Winter Use	0.9395	0.1847	1.1242

Furthermore, pursuant to its tariff, the Company has enclosed for filing the following Tariff Pages reflecting an increase in its COG Rates:

Supplement No. 1, Sixth Revised Page 2, Supplement No. 1, Sixth Revised Page 3, Fourteenth Revised Page 43.

These Tariff Pages are issued June 13, 2022 to be effective on July 1, 2022. Red-line versions of these Tariff Pages are also enclosed. In addition, Northern has provided an alternate set of clean and red-line tariff pages effective August 1, 2022. These alternate tariff pages are provided for illustrative purposes only in the event the proposed July 1, 2022 tariff pages cannot be approved before July 1. In addition, the alternate tariff sheets reflect a higher per therm rate increase due to the projected under-collection being recovered in shorter amount of time. Should any adjustment to the COG be delayed beyond July 1, Northern would seek to update these illustrative tariff calculations to reflect more current pricing.

Support for this rate increase is provided in the supplemental testimony of Christopher Kahl and accompanying attachments. The impact of the proposed July 1 change in COG rates on the typical residential heating customer for remainder of the

2021-2022 summer season will be an increase of \$11.33 or 3.32 percent more than the summer period bill at the Company's current COG rate.

Please do not hesitate to contact me if you have any questions concerning this filing.

Sincerely,

Matthew J. Fossum Senior Counsel

cc: Service List