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March 31, 2022

VIA ELECTRONIC AND MAIL DELIVERY

Daniel C. Goldner, Chairman
New Hampshire Public Utilities Commission
21 S. Fruit Street, Suite 10
Concord, N.H. 03301

Re: DW 22-002 – Pennichuck Water Works, Inc., Pennichuck East Utility, Inc.,
Pittsfield Aqueduct Company, Inc.
Miscellaneous Utility Service Fees
Parties Report to Commission – Proposed Procedural Schedule

Dear Chairman Goldner:

On March 30, 2022, the Commission held a duly-noticed prehearing. The Companies, the Department of Energy (DOE), and the Office of the Consumer Advocate (OCA), being the only parties in the proceeding, met in a technical session after the prehearing to discuss the issues and positions raised in the prehearing as well as a procedural schedule to govern the investigation of the Companies' fees.

During the prehearing, the OCA stated that the review of these rates should be done in the context of a general rate case. The OCA later explained that it was concerned about the impact of these fees on low-income residential ratepayers. The Companies responded that the Commission has historically addressed these miscellaneous utility service fees independent of a general rate case. Indeed, in Pennichuck East Utility, Inc.'s (PEU) last rate case, customers urged PEU to file to increase the miscellaneous utility service fees so as to avoid other customers subsidizing these miscellaneous fees. In the technical session, the DOE raised that investigation of the fees could be done more efficiently if it coincided with its Audit Staff's review of Pennichuck Water Works, Inc.'s (PWW) books and records-which is expected to occur later this summer after PWW files its general rate case.

In light of the policy issues raised by the OCA, the possibility that resolution of the policy issues may involve customer class subsidies and changes in rate design, as well as the efficiencies noted by the DOE, the Companies are amenable to withdrawing the tariffs and petition and refile its tariff and petition at a later date contemporaneously with the PWW's general rate case. The Companies expect that similar filings would be made contemporaneously with PEU and PAC's next general rate cases. This process would allow the parties to meet and discuss changes to the fees. The Parties plan to conduct a technical session on May 20, 2022 at 10 AM.

The Companies and parties believe that this path forward of investigating the Companies' miscellaneous utility service fees promotes the orderly and efficient conduct of the proceeding because, although this proceeding has been noticed, if resolution of this

proceeding involves subsidies from other customer rate classes as the OCA may propose, it would affect more customers than as originally filed and the proceeding would need to be re-noticed.

In conclusion, in lieu of filing a motion to dismiss as the OCA proposed at the prehearing, and in lieu of filing a proposed procedural schedule for the near-term investigation of the Companies' fees, the Companies, DOE, and OCA request that the Companies be allowed to:

- (1) withdraw, without prejudice, the miscellaneous utility service fee tariffs and petition; and
- (2) that the Commission allow PWW to refile such fees and petition at the time PWW files its general rate case schedules.

The DOE and OCA have reviewed this letter and concur with its content.

Thank you in advance for your assistance with this filing and for the Commission's consideration of the parties' schedule.

Very Truly Yours,



Marcia A. Brown

Enclosure

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