

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

Docket No. DW 19-084

Pennichuck Water Works, Inc.
Permanent Rate Proceeding

MOTION TO EXTEND DEADLINES

NOW COMES, Pennichuck Water Works (PWW) pursuant to Puc 203.07 and Puc 202.04, and hereby requests the Commission extend the deadline for filing certain documentation ordered to be filed by Order No. 26,425. In support of this request, PWW states as follows:

1. On November 24, 2020, by Order No. 26,425, the Commission approved PWW's revenue requirement and permanent rates. In that order, the Commission required that PWW file within 30 days of the date of the order PWW's calculation of the difference between temporary and permanent rates as well as a proposed surcharge for recovering the difference. The Commission also ordered PWW to file its final rate case expenses within 30 days. That deadline is Christmas Day Eve, December 24, 2020.

2. PWW requests that the deadline be extended to January 15, 2020. At first blush that extension may appear lengthy, however, PWW calculates the temporary and permanent rate recoupment at an individual customer-specific level. Because this type of calculation is not a normal billing software function, PWW must write a separate software program to calculate the recoupment, conduct a test run of the software, and then perform the actual calculations. The program had already been programmed and written, based upon PWW's understanding of the order, whereby all residential fixed charges were to increase at 7.81%, as opposed to the final conclusion by Staff and the OCA that the 7.81% applied to only the 5/8" meter fixed charge. As

such, the first program that was written to calculate the recoupment needs to be rewritten. PWW had held off on rewriting the program until there was an understanding among Staff and the parties as to the correct interpretation of Order No. 26,425 and how it was to impact existing rates. Staff and the parties did not reach agreement until December 15th PWW needs time to rewrite the recoupment program. Also, it normally takes PWW's in-house staff two full work weeks to complete the calculation portion in its billing software across its 28,000+ customers. The timing of the software rewrite will coincide with the holidays and times that PWW, and indeed the Commission, is closed.

3. Commission rule, Puc 202.04, allows the Commission to grant an extension if it finds that the requesting party demonstrates that circumstances would cause undue hardship or inconvenience unless the request were granted; and that the extension would not unduly delay the proceeding or adversely affect the rights of any party. PWW believes that the difficulties in writing the software program constitute an undue hardship for it to meet the December 24, 2020 deadline. PWW is diligently working to rewrite the recoupment program but the holidays and COVID-19 in-person restrictions are adding to its delay. Assuming the software rewrite is done in the next two weeks, for New Years, the January 15, 2021 deadline will give PWW the two full work weeks it needs. PWW will certainly strive to complete the calculations sooner if it is able. For these reasons, PWW believes extending the December 24, 2020 deadline to no later than Friday, January 15, 2021 is reasonable. Because this rate proceeding is largely concluded and that PWW and the settling parties had already agreed to delay recovery of the temporary-permanent rate recoupment and rate case expenses (as illustrated in Hearing Exhibit 9, page 91), PWW does not believe its request unduly delays the proceeding or adversely affects the rights of any party. PWW requests that the deadline for filing its rate case expenses also be delayed until

January 15, 2020 because it will be incurring additional rate case expenses past December 24, 2020 as it attends to the above calculations.

4. PWW has reached out to Staff and the parties for their position concerning this motion. Staff and the OCA do not object to the relief sought. The City of Nashua had not yet responded by the time of this filing.

WHEREFORE, PWW respectfully requests the Commission:

- A. Extend the December 24, 2020 deadline for filing its calculation and proposed surcharge for the temporary-permanent rate recoupment and rate case expenses recovery until no later than January 15, 2021; and
- B. Grant such other relief as is just and equitable.

Respectfully submitted,
Pennichuck Water Works, Inc.

By its Attorney,
NH BROWN LAW, PLLC

Dated: December 18, 2020

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Certificate of Service

I hereby certify that a copy of the foregoing motion has been emailed this day to the docket-related service list.

Marcia A. Brown
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