STATE OF NEW HAMPSHIRE BEFORE THE NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

DG -16-294

Re: Concord Steam Corporation

Petition for Temporary Rates

Concord Steam Corporation ("Concord Steam" or the "Company"), pursuant to RSA 378:27, petitions the New Hampshire Public Utilities Commission (the "Commission") to fix, determine and prescribe, effective with service rendered April 1, 2016, reasonable temporary rates pending the Commission's final decision on the Company's request for permanent rate relief in this docket. In support of this request, Concord Steam states as follows:

- 1. On March 17, 2016, and in accordance with Puc Rule 1604.05, Concord Steam filed a Notice of Intent to file Rate Schedules with the Commission.
- 2. Contemporaneous with this Petition for Temporary Rates, Concord Steam is filing a revised tariff page to NHPUC No. 2 Steam, proposing an increase in the Company's permanent rates. If approved, such rates will produce an increase of \$810,083 in its revenues from usage. This represents an overall increase of 14% over Concord Steam's current operating revenues for the test year ending December 31, 2015. A discussion of the Company's reasons for proposing an increase in its rates is set forth in the testimony supporting the Company's request for a permanent increase in usage rates.
- 3. The Company's last authorized overall rate of return was 8.31%, although the Company only requested a return of 3.2%, based on an 9.75% return on equity.

- 4. The Company did not earn its allowed rate of return during the test year. As of December 31, 2015, the Company's overall rate of return was 0.04% on a weather normalized basis, well below the currently allowed rate of 3.2%.
- 5. Unless temporary and, ultimately, permanent rate relief is granted, the Company will not earn a reasonable rate of return on the cost of its property used and useful in the public service. The continuation of current rates will result in the confiscation of the Company's property.
- 6. The reports on file with the Commission and supporting documentation filed in connection with the Company's permanent rate request and with this Petition demonstrate that the Company is earning substantially below its allowed rate of return. The Company therefore requests that this Commission order a temporary rate increase, applied to all customers in order to generate an increase of \$750,702 in revenues from usage for a total increase of 12.8% in operating revenues annually.
- 7. The temporary rates proposed herein are just and reasonable, and therefore should be granted.

WHEREFORE, the Company respectfully requests that the Commission:

- A. Grant this Petition for Temporary Rates, allowing the Company an increase in the amount of \$750,702 in annual operating revenue to be effective with service rendered as of April 1, 2016;
- B. Order that the proposed temporary rate increase be implemented through an equal dollar increase in all usage rates;
- C.. Order such temporary rates to remain in effect until a determination of the Company's request for a permanent rate increase; and
- D.. Grant such other relief as is just and equitable.

Respectfully submitted,

CONCORD STEAM CORPORATION

Date: March 15, 2016

Peter Bloomfield, President

Concord Steam Corp

PO Box 2520

Concord, NH 03302

Certificate of Service

I hereby certify that a copy of this Petition for Temporary Rates has been hand delivered to the Consumer Advocate this $17^{\rm th}$ day of March, 2016.

By:

Peter Bloomfield