

**STATE OF NEW HAMPSHIRE**  
**BEFORE THE**  
**PUBLIC UTILITIES COMMISSION**

Docket No. DW 17-128

Pennichuck East Utilities, Inc.  
Request for Change in Rates

**MOTION FOR WAIVER OF PUC 1203.05(b)**

NOW COMES, Pennichuck East Utilities, Inc. (the “Company” or “PEU”), in accordance with N.H. Admin. Rule Puc 201.05, and hereby moves the New Hampshire Public Utilities Commission (the “Commission”) to waive N.H. Admin. Rule Puc 1203.05(a). In support of its motion, PEU states as follows:

1. Puc 1203.05 provides that, “unless a utility petitions the commission for a waiver all rate changes implemented as a result of a commission order ... shall be implemented on the basis of service rendered on or after the effective date of the approved rate change.”

2. The Settlement Agreement on Permanent Rates filed by the parties on July 18, 2018 provides the “Settling Parties agree that PEU should be authorized to charge customers an amount equal to the difference between the revenues PEU would have collected had the agreed upon level of permanent rates been in effect for *bills-rendered on and after January 8, 2018*, and the actual revenues collected during the temporary rate period.” Emphasis added, Settlement Agreement at 8.

3. PEU is requesting that permanent rates be implemented on a bills rendered basis on or after January 8, 2018 because it represents the first full monthly bill that was issued

following notice to all customers. In accordance with Puc 1203.05(c), implementing temporary rates on a bills rendered basis would:

- a. be less confusing to customers. By using a bills rendered basis, temporary rates would be applied to the entire month rather than require a pro-ration of bills when temporary rates are reconciled with permanent rates.
  - b. cost less for the Company;
  - c. give customers adequate notice of the changes in rates applicable to their usage.
4. The only potential negative would be that the Company would lose revenue by implementing temporary rates on a bills rendered basis. The Company is willing to forego some amount of revenue to avoid confusing its customers and for the gains in efficiency to the Company if implemented on a bills rendered basis.
5. For the reasons stated above, the balance of the factors for waiver under Puc 1203.05 supports waiver. The granting of PEU's request is in the public interest and will not disrupt the orderly and efficient resolution of this proceeding.
6. As it is a term of the Settlement Agreement, all parties have consented to implementing temporary rates on a bills rendered basis.

WHEREFORE, PEU respectfully requests that the Commission:

- A. Grant this Motion for Waiver of Puc 1203.05 (a); and
- B. Provide such other relief as is just and equitable.

Respectfully submitted,

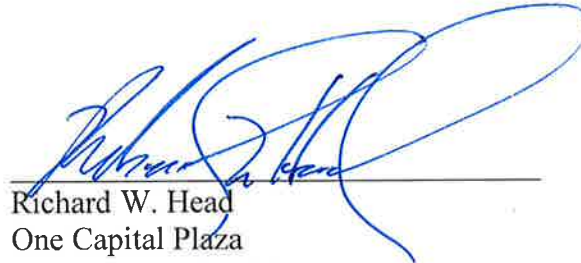
PENNICHUCK EAST UTILITIES, INC.

By its Attorneys,

RATH, YOUNG AND PIGNATELLI, PC

Date: July 18, 2018

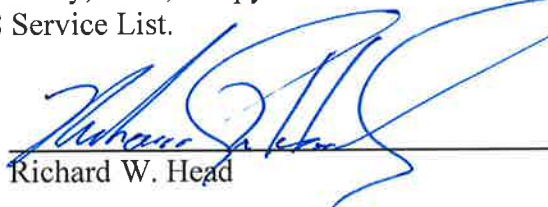
By:



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**Certificate of Service**

I hereby certify that on this 18<sup>th</sup> day of July, 2018, a copy of this motion has been served electronically to the Docket No. DW 17-128 Service List.



Richard W. Head