Date Request Received: November 3, 2017

Date of Response: November 8, 2017

Request No.: Hampton 1-1

Witness: Troy Dixon

REQUEST: Please indicate:

a. how many years of depreciable life are involved for the asset associated with the 2018 WCA surcharge being sought herein;

b. where in the Petition this number of years of depreciable life is specified, if it is;

c. what the source is of the 1.20% figure that is utilized for this asset on Attachment TD-1, Page 3 of 3;

RESPONSE:

a. Water mains have a depreciable life of 83 years (1.2%).

b. The depreciation rate of 1.2% reflected on Attachment TD-1, Page 3 of 3.

c. The depreciation rates for all of the Company's assets were approved as part of the Company's Rate Case, DW 08-098.

Date Request Received: November 3, 2017

Date of Response: November 8, 2017

Request No.: Hampton 1-2 Witness: Troy Dixon

REQUEST: Please generate a Payment Schedule of the stream of yearly payments,

represented by the 2018 WICA surcharge that covers \$813,883 in WICA costs from 2017 projects, over the number of years of depreciable life for

the assets involved and provide a total of the payments scheduled.

RESPONSE: The WICA surcharge reflects the full cost of providing service associated

with the respective WICA infrastructure improvements. The individual cost of service elements are depicted on Schedule TD-1, page 1. The proposed WICA surcharge would go into effect as of January 1st and

remain as such until the Company's next filing.

Date Request Received: November 3, 2017

Date of Response: November 8, 2017

Request No.: Hampton 1-3

Witness: Troy Dixon

REQUEST: Please identify the source of the funding for the Company's WICA costs incurred for the 2017 WICA projects that total \$813,883, including details for each loan taken out by the Company (whether through internal or external borrowing) to fund that amount, such as the identity of the lender, the interest rate charged, and the term of the loan.

OBJECTION: Aquarion respectfully objects to this discovery request because the request does not seek information that is relevant to the instant proceeding nor is the requested information reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Notwithstanding the objection, Aquarion is providing the following response.

RESPONSE: Aquarion Water Company of New Hampshire, Inc. finances its rate base additions, including the WICA projects that are the subject of this proceeding, through a combination of internally generated funds (i.e., depreciation and net income) and internal or external financing. There have been no new external financings since the Company's last rate proceeding.

Date Request Received: November 3, 2017

Date of Response: November 8, 2017

Request No.: Hampton 1-4

Witness: Troy Dixon

REQUEST: Please generate a repayment schedule ((broken down between "principal" and interest" for each payment) for the repayments being made or projected to be made by the Company in connection with the borrowing identified in the answer to Hampton Data Request 1-3.

OBJECTION: Aquarion respectfully objects to this discovery request because the request does not seek information that is relevant to the instant proceeding nor is the requested information reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Notwithstanding the objection, Aquarion is providing the following response.

RESPONSE: As per the response to Hampton 1-3, there are no new borrowings which would necessitate interest payments.

Date Request Received: November 3, 2017

Date of Response: November 8, 2017

Request No.: Hampton 1-5 Witness: Troy Dixon

REQUEST: Please provide copies of any loan documents executed by the Company in connection with the borrowing that has occurred as identified in response to Hampton Data Request 1-3, including, without being limited to, Notes, Loan Agreements, Repayment Schedules, etc.

OBJECTION: Aquarion respectfully objects to this discovery request because the request does not seek information that is relevant to the instant proceeding nor is the requested information reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Notwithstanding the objection, Aquarion is providing the following response.

RESPONSE: As per the responses to Hampton 1-3 and 1-4, there are no new debt issues.

Date Request Received: November 3, 2017

Date of Response: November 8, 2017

Request No.: Hampton 1-6

Witness: Troy Dixon

REQUEST: Does the Company admit that, from Day 1, as well as when all the WICA surcharge payments are completed as are set forth in the Payment Schedules generated in response to Hampton Data Request 1-2, that the Company will have 100% of the ownership of the assets that have been paid for by the WICA surcharge?

OBJECTION: Aquarion respectfully objects to this discovery request because the request does not seek information that is relevant to the instant proceeding nor is the requested information reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Notwithstanding the objection, Aquarion is providing the following response.

RESPONSE: No. The Company owns its assets on Day 1.

Date Request Received: November 3, 2017

Date of Response: November 8, 2017

Request No.: Hampton 1-7

Witness: Troy Dixon

REQUEST: Does the Company agree that when all the WICA surcharge payments are completed as are set forth in the payment Schedule generated in response to Hampton Data Requests 1-2, that reserving for construction of those assets should cease and be removed from the Company's tariff?

OBJECTION: Aquarion respectfully objects to this discovery request because the request does not seek information that is relevant to the instant proceeding nor is the requested information reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Notwithstanding the objection, Aquarion is providing the following response.

RESPONSE: No, the above statement does not accurately reflect 1) ratemaking principles in general, and 2) how the WICA functions. The WICA surcharge is updated each year and as such, the subsequent year replaces the prior years' surcharge. Therefore, the prior years' surcharge ceases and is replaced on the tariff with the subsequent years' surcharge.

Date Request Received: November 3, 2017

Date of Response: November 8, 2017

Request No.: Hampton 1-8

Witness: Troy Dixon

REQUEST: Please set forth the Company's return on equity achieved in 2016 and 2017 and please indicate for each such year what percentage of the achieved return on equity is due to the WICA program as was set forth in response to Staff Tech Session 1-3 in DW 16-123.

RESPONSE: The Company's ROE for 2016 was 13.11% and was 11.50% for the 12 months ended September 2017. The Company does not perform a calculation to attribute a percentage of the achieved return to the WICA program. The WICA surcharge merely provides the opportunity to recover costs and earn a return on WICA eligible rate base.

Date Request Received: November 3, 2017

Date of Response: November 8, 2017

Request No.: Hampton 1-9

Witness: Troy Dixon

REQUEST: Does the Company admit that the 8.71% surcharge percent shown on page 1 of 9 of Attachment TD-3 (that is estimated to be associated with the 2018 projects) means that the WICA cap of 7.5% would be exceeded if these projects are completed as priced and that recovery for same cannot be sought through WICA unless the WICA surcharge is reset?

RESPONSE: No. As per page 7, line 6 of Mr. Dixon's testimony, TD-3 was set up for illustrative purposes only. The Company will seek WICA surcharges consistent with its approved tariff.

Date Request Received: November 3, 2017

Date of Response: November 8, 2017

Request No.: Hampton 1-10

Witness: Troy Dixon

REQUEST: If the Company admits Hampton 1-9, doesn't this mean that the Company

will need to file a general rate case in 2018 in order to reset the WICA

surcharge to zero in order to avoid exceeding the 7.5% cap?

RESPONSE: There is no admission in Hampton 1-9.

No.

Date Request Received: November 3, 2017

Date of Response: November 8, 2017

Request No.: Hampton 1-11 Witness: Troy Dixon

REQUEST: Does the Company intend to file a general rate case in 2018 in order to reset

the WICA surcharge to zero?

RESPONSE: The Company has not determined the timing of its next general rate

proceeding.

Date Request Received: November 3, 2017

Date of Response: November 8, 2017

:

Request No.: Hampton 1-12

Witness: Troy Dixon

REQUEST: Does the testimony of Troy Dixon that "TD-3 was set up for illustrative purposes only," mean that the Company does not intend to proceed with the proposed 2018 WICA eligible projects unless it files a general rate case in

2018 in order to reset the WICA surcharge to zero?

RESPONSE: No. Please refer to the response to Hampton 1-9.

Date Request Received: November 17, 2017

Date of Response: November 28, 2017

Request No.: Hampton 2-1

Witness: Troy Dixon

REQUEST: As requested in Hampton Data Request 1-2, but not provided by the Company, please generate and provide as part of the Answer to this Hampton Data Request 2-1, a Payment Schedule of the stream of yearly payments, that will result from the granting of the 2018 WICA surcharge that covers \$813,883 in WICA costs from 2017 projects, over the 83 years of depreciable life for the assets involved and provide a total of the payments on the schedule over that 83-year period.

RESPONSE: The Company did not provide the requested "stream of payments" hypothetical because there is no guaranteed stream of payments. In this filing, the \$813,883 of WICA costs generates an incremental revenue requirement comprised of:

Return on Investment:	\$60,627
Income Tax Expense:	21,531
Depreciation:	8,886
Property Tax Expense	12,457
Total Revenue Requirement	\$103,502

The WICA surcharge, as depicted above, is the only revenue stream that is requested and would be authorized in this proceeding. It will also continue as such until the issuance of a subsequent regulatory decision. Furthermore,

- If the Company files no subsequent WICA or rate case, the stream remains unchanged.
- If/when a WICA is filed, except for depreciation, all of the numbers above will change accordingly.
- If a rate case is filed, all WICA surcharges are rolled into base rates. As such, all of the above numbers may change based on potential changes to capital structure, debt and equity rates of return, income tax rates, depreciation rates, etc.
- After a rate case, the revenue requirement remains fixed until the subsequent rate case.

Due to all of the factors above, and specifically the speculative timing and details of future regulatory proceedings, it is impossible to generate an accurate "stream of payments" as requested.

Date Request Received: November 17, 2017

Date of Response: November 28, 2017

Request No.: Hampton 2-2

Witness: Troy Dixon

REQUEST:

Please explain the net project cost of \$740,516 that the Company is using

to straight-line depreciate as presented in schedules TD-1.

(813,883 - 73,367 = 740,516) $(740,516 \times 1.2\% = 8,886)$

(8,886/2 = 4,443)

RESPONSE: As per the response to Hampton 2-4, \$740,516 is not the net project cost. Notwithstanding, depreciation expense is calculated by multiplying the original asset cost by the applicable depreciation rate. Given that an asset is being retired, there is a corresponding reduction in depreciation for that retired asset. Therefore, the effective net depreciation expense reflects the total asset cost less the asset cost of the retirement, all multiplied by the depreciation. For the purposes of accumulated depreciation, the half year convention is utilized in year one of the asset life.

Date Request Received: November 17, 2017

Date of Response: November 28, 2017

Request No.: Hampton 2-3

Witness: Troy Dixon

REQUEST:

Please explain why retirements are being subtracted from the new on-line

asset to calculate the annual depreciation?

RESPONSE: There is depreciation expense associated with the asset being retired. The Company effectively removes the depreciation of the existing asset and replaces it with depreciation expense on the new asset.

Date Request Received: November 17, 2017

Date of Response: November 28, 2017

Request No.: Hampton 2-4

Witness: Troy Dixon

REQUEST:

The WICA dollars cost are calculated taking the "actual project cost" (\$813,883) less any accumulated depreciation. For fiscal year 2018, \$813,883 less 6 months of depreciation of \$4,443 to equal \$809,440. Why is the Company for fiscal years 2018, 2019, 2020, and 2021 as presented in schedules TD-1 continuously projecting allowable revenues using a cost value of \$809,440 rather than the depreciable value of \$740,516?

RESPONSE: The new Lafayette Road main does not have a depreciable value of \$740,516. \$740,515 reflects the *net change* in gross plant and is useful for the determination of depreciation impacts only. The rate of return component of the revenue requirement, however, is based upon the rate base value of \$813,883. While the retirement of an asset has the effect of reducing depreciation, the accounting entries associated with removing the asset are rate base neutral. In this instance, the debit entry is to accumulated depreciation while the credit entry is to utility plant.

HAMPTON 2-2

Please explain the net project cost of \$740,516 that the Company is using to straight-line depreciate as presented in schedules TD-1.

(813,883 – 73,367 = 740,516) (740,516 X 1.2% = 8,886) (8,886/2 = 4,443)

HAMPTON 2-3

Please explain why retirements are being subtracted from the new on-line asset to calculate the annual depreciation?

HAMPTON 2-4

The WICA dollars cost are calculated taking the "actual project cost" (\$813,883) less any accumulated depreciation. For fiscal year 2018, \$813,883 less 6 months of depreciation of \$4,443 to equal \$809,440. Why is the Company for fiscal years 2018, 2019, 2020, and 2021 as presented in schedules TD-1 continuously projecting allowable revenues using a cost value of \$809,440 rather than the depreciable value of \$740,516?

HAMPTON 2-5

Attached are three payment schedules that have been generated by the Town of Hampton to show the stream of payments that would be made over the depreciable life of the water main asset that is new to the 2018 WICA surcharge. Please be prepared to explain at the Technical Session that is scheduled for December 5, 2017 at 10:00 a.m., whether you find these charts are accurate or inaccurate, and if inaccurate, why.

Dated: November 17, 2017

Respectfully submitted,

Town of Hampton By its Town Attorney

Mark S. Gearreald, Esq. NH Bar ID #913 Town of Hampton 100 Winnacunnet Road Hampton, NH 03842 (603) 929-5816

Mark & Garrendol

Hampton Calculation

Tumpton Guidalation			Property Tax	WICA		
	Net	Depreciation	Depreciation	Expense = asset		Adjustment
WICA year	Investment	Exp	Value x 7.49	value/1000*12	Income Tax	Dollars
2018*	808,999	4,884	60,594	9,708	21,531	96,717
2019	804,115	9,767	60,228	9,649	21,531	101,176
2020				9,532	21,531	100,327
2021		9,767				99,478
2022				250		98,629
2022						97,781
2024						
2025						95,234
2026						
2027						
2028						
2029	706,445					
2030	696,678	9,767	52,181			
2031	686,911	9,767	51,450	8,243	21,531	90,991
2032	677,144	9,767	50,718	8,126	21,531	90,142
2033	667,377	9,767	49,987	8,009	21,531	89,293
2034	657,610	9,767	49,255	7,891	21,531	88,444
2035	(A		48,523	7,774	21,531	87,596
2036				7,657	21,531	86,747
2037					21,531	85,898
2038						
2039						23524020
2040						
2041		9,767				
2042						
2043						
2044 2045						
2046	and the second s	The state of the s	40,476			
2047			39,745			
2048		9,767	39,013			A STATE OF THE PARTY OF THE PAR
2049						
2050		9,767	37,550			
2051		9,767		5,899 5,782		
2052			36,087 35,356			
2053 2054		9,767	34,624			
2055		9,767	33,892			
2056			33,161	5,313		
2057			32,429			
2058			31,698	5,078		
2059			30,966			
2060		9,767	30,235			and the second s
2061 2062		9,767 9,767	29,503 28,772			
2063			28,040			

2064	364,600	9,767	27,309	4,375	21,531	62,982
2065	354,833	9,767	26,577	4,258	21,531	62,133
2066	345,066	9,767	25,845	4,141	21,531	61,284
2067	335,299	9,767	25,114	4,024	21,531	60,435
2068	325,532	9,767	24,382	3,906	21,531	59,587
2069	315,765	9,767	23,651	3,789	21,531	58,738
2070	305,998	9,767	22,919	3,672	21,531	57,889
2071	296,231	9,767	22,188	3,555	21,531	57,040
2072	286,464	9,767	21,456	3,438	21,531	56,192
2073	276,697	9,767	20,725	3,320	21,531	55,343
2074	266,930	9,767	19,993	3,203	21,531	54,494
2075	257,163	9,767	19,262	3,086	21,531	53,645
2076	247,396	9,767	18,530	2,969	21,531	52,797
2077	237,629	9,767	17,798	2,852	21,531	51,948
2078	227,862	9,767	17,067	2,734	21,531	51,099
2079	218,095	9,767	16,335	2,617	21,531	50,250
2080	208,328	9,767	15,604	2,500	21,531	49,402
2081	198,561	9,767	14,872	2,383	21,531	48,553
2082	188,794	9,767	14,141	2,266	21,531	47,704
2083	179,027	9,767	13,409	2,148	21,531	46,855
2084	169,260	9,767	12,678	2,031	21,531	46,007
2085	159,493	9,767	11,946	1,914	21,531	45,158
2086	149,726	9,767	11,214	1,797	21,531	44,309
2087	139,959	9,767	10,483	1,680	21,531	43,460
2088	130,192	9,767	9,751	1,562	21,531	42,612
2089	120,425	9,767	9,020	1,445	21,531	41,763
2090	110,658	9,767	8,288	1,328	21,531	40,914
2091	100,891	9,767	7,557	1,211	21,531	40,065
2092	91,124	9,767	6,825	1,093	21,531	39,217
2093	81,357	9,767	6,094	976	21,531	38,368
2094	71,590	9,767	5,362	859	21,531	37,519
2095	61,823	9,767	4,631	742	21,531	36,670
2096	52,056	9,767	3,899	625	21,531	35,822
2097	42,289	9,767	3,167	507	21,531	34,973
2098	32,522	9,767	2,436	390	21,531	34,124
2099	22,755	9,767	1,704	273	21,531	33,275
2100	12,988	9,767	973	156	21,531	32,427
2101	3,221 ass	5,574,409				

Aquarion Calculation (revised by Hampton)

Aquarion Calcul	ation (revised by	riampion)	Property Tax		WICA
		Depreciation	Expense = asset		Adjustment
Net Investment	Depreciation Exp	1974 J. 1014 P. B. L. T. B.	value/1000*12	Income Tax	Dollars
809,440	4,443	60,627	9,713	21,531	96,314
804,997	8,886	60,294	9,660	21,531	100,371
796,111	8,886	59,629	9,553	21,531	99,599
787,225	8,886	58,963	9,447	21,531	98,827
778,339	8,886	58,298	9,340	21,531	98,055
769,453	8,886	57,632	9,233	21,531	97,282
760,567	8,886	56,966	9,127	21,531	96,510
751,681	8,886	56,301	9,020	21,531	95,738
742,795	8,886	55,635	8,914	21,531	94,966
733,909	8,886	54,970	8,807	21,531	94,194
725,023	8,886	54,304	8,700	21,531	93,421
716,137	8,886	53,639	8,594	21,531	92,649
707,251	8,886	52,973	8,487	21,531	91,877
698,365	8,886	52,308	8,380	21,531	91,105
689,479	8,886	51,642	8,274	21,531	90,333
680,593	8,886	50,976	8,167	21,531	89,561
671,707	8,886	50,311	8,060	21,531	88,788
662,821	8,886	49,645	7,954	21,531	88,016
653,935	8,886	48,980	7,847	21,531	87,244
645,049	8,886	48,314			
636,163	8,886	47,649	7,634		
627,277	8,886	46,983	7,527		
618,391	8,886	46,317 45,652	7,421 7,314	21,531 21,531	
609,505	8,886 8,886	44,986	7,207		
600,619 591,733		44,321	7,101		
582,847	8,886	43,655	6,994		
573,961	8,886	42,990	6,888		
565,075	8,886	42,324	6,781	21,531	
556,189	8,886	41,659	6,674	21,531	
547,303	8,886	40,993	6,568	21,531	77,978
538,417	8,886	40,327	6,461	21,531	77,205
529,531	8,886	39,662	6,354	21,531	76,433
520,645	8,886	38,996	6,248		
511,759	8,886	38,331	6,141	21,531	
502,873	8,886	37,665	6,034		
493,987	8,886	37,000	5,928		
485,101	8,886	36,334	5,821	21,531	
476,215	8,886	35,669	5,715		
467,329	8,886	35,003	5,608		
458,443	8,886	34,337	5,501	21,531	
449,557	8,886	33,672	5,395		
440,671 431,785	8,886 8,886	33,006 32,341	5,288 5,181	21,531 21,531	
422,899	8,886	31,675	5,075		
414,013	8,886	31,010	4,968		

405,127	8,886	30,344	4,862	21,531	65,623
396,241	8,886 8,886	29,678 29,013	4,755 4,648	21,531 21,531	64,850
387,355 378,469	8,886	28,347	4,542	21,531	64,078 63,306
369,583	8,886	27,682	4,435	21,531	62,534
360,697	8,886	27,016	4,328	21,531	61,762
351,811	8,886	26,351	4,222	21,531	60,989
342,925	8,886	25,685	4,115	21,531	60,217
334,039	8,886	25,020	4,008	21,531	59,445
325,153	8,886	24,354	3,902	21,531	58,673
316,267	8,886	23,688	3,795	21,531	57,901
307,381	8,886	23,023	3,689	21,531	57,128
298,495	8,886	22,357	3,582	21,531	56,356
289,609	8,886	21,692	3,475	21,531	
280,723	8,886	21,032	3,369	21,531	55,584 54,812
271,837	8,886	20,361	3,262	21,531	54,040
262,951	8,886	19,695	3,155	21,531	53,267
254,065	8,886	19,029	3,049	21,531	100100.
245,179	8,886	18,364	2,942	21,531	52,495 51,723
236,293	8,886	17,698	2,836	21,531	50,951
227,407	8,886	17,033	2,729	21,531	50,179
218,521	8,886	16,367	2,622	21,531	49,406
209,635	8,886	15,702	2,516	21,531	48,634
200,749	8,886	15,036	2,409	21,531	47,862
191,863	8,886	14,371	2,302	21,531	47,092
182,977	8,886	13,705	2,196	21,531	46,318
174,091	8,886	13,039	2,089	21,531	45,546
165,205	8,886	12,374	1,982	21,531	44,773
156,319	8,886	11,708	1,876	21,531	44,001
147,433	8,886	11,043	1,769	21,531	43,229
138,547	8,886	10,377	1,663	21,531	42,457
129,661	8,886	9,712	1,556	21,531	41,685
120,775	8,886	9,046	1,449	21,531	40,912
111,889	8,886	8,380	1,343	21,531	40,140
103,003	8,886	7,715	1,236	21,531	39,368
94,117	8,886	7,049	1,129	21,531	38,596
85,231	8,886	6,384	1,023	21,531	37,824
	sset value after 83 years	26243	1:		5,762,302
	mental watermanne allements and				

Aquarion Actual Calculation (according to WICA calculation of surcharge)

Aquanon Actual	Odiodiation (acc	oranig to micrit	Property Tax	3 /	WICA
		Depreciation	Expense = asset		Adjustment
Net Investment	Depreciation Exp		value/1000*12	Income Tax	Dollars
809,440	8,886	60,627	12,457	21,531	103,502
809,440	8,886	60,627	12,457	21,531	103,502
809,440	8,886	60,627	12,457	21,531	103,502
809,440	8,886	60,627	12,457	21,531	103,502
809,440	8,886	60,627	12,457	21,531	103,502
809,440	8,886	60,627	12,457	21,531	103,502
809,440	8,886			21,531	103,502
809,440				21,531	103,502
809,440	8,886	60,627		21,531	103,502
809,440	8,886				103,502
809,440			12,457		
809,440					
809,440					(0.)
809,440	10 20 2				
809,440					
2-6-6-4-1-12-14-15-15-15-15-15-15-15-15-15-15-15-15-15-					
809,440		60,627			3.50
809,440					
809,440	8,886	60,627			
809,440	8,886	60,627			
809,440	8,886 8,886				Company of the compan
809,440 809,440	8,886	60,627			
809,440	8,886	60,627	12,457		
809,440	8,886	60,627			
809,440	8,886	60,627			
809,440	8,886	60,627			
809,440	8,886	60,627			
809,440	8,886	60,627			
809,440	8,886	60,627			
809,440		60,627 60,627			
809,440 809,440		60,627			
809,440	8,886	60,627			
809,440		60,627			
809,440	8,886	60,627			
809,440		60,627			
809,440	8,886	60,627			
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809,440	8,886	60,627	12,457	21,531	103,502
809,440	8,886	60,627	12,457	21,531	103,502
66 (2) (8)	value after 83 yea		control (Trib)	1000 F	8,590,671
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Date Request Received: November 17, 2017

Date of Response: November 28, 2017

Request No.: Hampton 2-6

Witness: Troy Dixon

REQUEST: Please produce copies of all materials Aquarion has submitted to the State of New Hampshire Department of Revenue Administration by way of asset valuation for the last three years; these are the materials that DRA utilizes to arrive at the valuation figures that it provides to the Towns, but it is the Town's understanding that the information that is provided to DRA by utilities is not released unless release is authorized by the utility involved. The Town believes these materials will reflect not only asset values but also how those assets are depreciated.

RESPONSE: Aquarion objects to this request on the basis of relevance. Notwithstanding the objection, Aquarion will bring documents to the technical session and will be prepared to explain why the documents are not used in the manner the Town suggests.

Depreciation schedule for payment (66.67 years or 1.5%)

Depreciation schedule for payment (30.30 years or 3.3%)

YEAR