THE STATE OF NEW HAMPSHIRE

CHAIRMAN Martin P. Honigberg

COMMISSIONERS Kathryn M. Bailey Michael S. Giaimo

EXECUTIVE DIRECTOR Debra A. Howland

THE PARTY OF THE P

PUBLIC UTILITIES COMMISSION 21 S. Fruit Street, Suite 10 Concord, N.H. 03301-2429 TDD Access: Relay NH 1-800-735-2964

Tel. (603) 271-2431

FAX (603) 271-3878

Website: www.puc.nh.gov

January 7, 2019

NHPUC 7JAN'194410:52

Debra A. Howland, Executive Director New Hampshire Public Utilities Commission 21 South Fruit Street, Suite 10 Concord, New Hampshire 03301-2429

Re: DW 18-076 – Pennichuck Water Works, Inc. ("PWW" or "Company")
Tariff Changes re: Small Diameter Private Fire Protection Non-Metered Service
Staff Recommendation relative to Motion for Waiver of Puc 1203.05(b)

Dear Ms. Howland:

On January 4, 2019, PWW filed a Motion for Waiver of N.H. Admin. Rule Puc 1203.05(b). Staff recommends that the Commission approve PWW's motion.

On December 17, 2018, the Commission issued Order No. 26,200 in the above named proceeding which approved certain changes to terms of service and rates on pages 32, 43, and 45 of PWW's tariff relative to small diameter private fire protection non-metered service. The Commission's order also approved the issuance of credits to a limited number of customers within the City of Nashua. The rate changes approved for tariff pages 43 and 45 as well as the customer credits will become effective on January 16, 2019.

PWW normally issues its bills under tariff pages 43 and 45 monthly and in arrears for services rendered. However, PWW seeks a waiver of Puc 1203.05(b) for the customers affected by the recently approved tariff changes and customer credits in order to implement such as of its February 2019 customer billings.

PWW argues that implementing the rate changes in this manner would be less confusing to the affected customers because the bills would not be split between prorated portions of old and new tariff rates. Rather, the rates would change at the conclusion of one bill and in time for the next, as customers are accustomed to seeing. Further, implementing the rate change on a bills-rendered basis would allow PWW to avoid the cost of labor-intensive calculations for multiple individual customer bills. Finally, PWW indicates that the Commission has approved similar implementations of rate changes in

this manner in the past. See Commission Order No. 25,990 (February 17, 2017) and Commission Order No. 26,136 (May 31, 2018) (regarding Pennichuck East Utility, Inc.).

Staff has reviewed PWW's motion and agrees that the Company's proposal would result in less confusion for affected customers and would be more efficient for the Company to implement. As such, Staff believes that approval of PWW's motion would be just and reasonable and in the public interest.

Thank you for your assistance with this matter. If you have any further questions, please do not hesitate to contact me.

Sincerely,

Jayson P. Laflamme

Assistant Director, Gas-Water Division

cc: Service List

SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED

Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.

Executive.Director@puc.nh.gov
amanda.noonan@puc.nh.gov
Christopher.tuomala@puc.nh.gov
david.shulock@puc.nh.gov
donald.kreis@oca.nh.gov
f.anne.ross@puc.nh.gov
jayson.laflamme@puc.nh.gov
Kathryn.akerman@puc.nh.gov
mab@nhbrownlaw.com
ocalitigation@oca.nh.gov
robyn.descoteau@puc.nh.gov
steve.frink@puc.nh.gov

Docket #: 18-076-1 Printed: January 07, 2019

FILING INSTRUCTIONS:

a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:

DEBRA A HOWLAND

EXECUTIVE DIRECTOR
NHPUC
21 S. FRUIT ST, SUITE 10
CONCORD NH 03301-2429

- b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.
- c) Serve a written copy on each person on the service list not able to receive electronic mail.