

**IR 20-089**  
**Pennichuck Water Works, Inc., Pennichuck East Utilities, Inc., Pittsfield Aqueduct  
Company, Inc.**

**Responses Reporting Period May 31, 2020**  
**Filing Period June 30, 2020**

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**Item # 1**

Provide information regarding changes in payment behavior or patterns and account receivables levels since the declaration of the State of Emergency on March 13 and the Governor's Emergency Order #3 issued on March 17. Such information should be provided for each utility rate class.

**Response:**

Please see the attached files as it relates to this requested data.

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**Item # 2**

Provide the following data for each utility rate class:

- a) The number, and percentage, of customers who made partial or no payment in March, April, and May of 2019 and 2020.
- b) The number, and percentage, of customers who made partial or no payment in March, April, and May of 2019 and 2020 and did not have an outstanding balance during the prior six months.

**Response:**

- a) Files and data are attached with regards to this requested information for the periods cited.
- b) The attached files include the analysis requested for this item for the periods cited.

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**Item # 3**

Describe any programs or initiatives undertaken to assist customers specifically as a result of the COVID-19 pandemic, the State of Emergency, Emergency Order #3, and the related stay-at-home restrictions.

**Response:**

No specific programs or initiatives have been undertaken, as it relates to payment delinquencies due to COVID-19, and no customers have contacted us at this juncture with regards to request extended payment plans at this time. They will be arranged on a customer by customer basis, as needed. With regards to customer safety, the Company has instituted a process as it relates to customer contact, to minimize physical contact with customers and/or entry into their residences or premises. A definition of essential versus non-essential duties has been established in conformity with the Company's pandemic response protocols, and as such, entry into customer premises is only done for emergency procedures. And, when needing to be done, is done with full PPE equipment and socially distancing protocols observed. All Company personnel that can work remotely from home, have done so since the beginning of March. Any field personnel that cannot perform their duties from home, have been working in an isolated and segregated manner in order to fully comply with the orders, while still performing necessary and essential duties.

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**Item # 4**

Provide a detailed description of customer outreach undertaken to date.

**Response:**

As detailed in the presentation given in the hearing on June 17<sup>th</sup>, the Company has undertaken several outreach initiatives to alert customers to pandemic response protocols in place, including:

- An automated phone message to all customers for which we have phone numbers
- An update and message on our website about protocols
- An outreach and updates to customers using Facebook

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**Item # 5**

Describe the Utility's review and evaluation of best practices and successful initiatives undertaken in other states.

**Response:**

Pennichuck has been attended in numerous local (City of Nashua, Granite State Rural Water) , regional (NEWWA) and national (AWWA and USEPA) webinars regarding how utilities are responding the COVID-19 pandemic. Pennichuck reviews the weekly updates from the NHDES regarding best practices for utility operations during COVID-19.

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**Item # 6**

Describe whether the Utility has updated its sales forecasts in light of the pandemic and its effects on the economy.

**Response:**

The Company has not updated its budget at this time, as the impact of COVID-19 to date on revenues of the Company, have not been material, especially in light of the fact that the summer watering season has started with a “dry” environment where residential consumption levels have been at or in excess of expected levels. As to forecasts that were provided to our credit rating agency for our most recent bond issuance, for a conservative outlook, we did temper our forecasted revenues for our Pennichuck Water Works, Inc. subsidiary by \$1.5 million, but that was done as much for the timing of getting our current rate case in pendency completed, as it was for the impacts of COVID-19.

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**Item # 7**

Describe any operational changes the Utility is making or planning to make in response to the effects of the pandemic, including changes in budgets or personnel.

**Response:**

We have not made any changes in budgets or personnel. In fact, the Company has been able to keep its entire workforce employed through this period of time. Operational changes have all been centered on the definition of essential versus non-essential operations activities, and due to that certain operational activities were temporarily deferred or altered. Examples of this is deferral of meter PTs in residences and facilities during this period of time, that alteration of timing of certain non-critical flushing activities from Spring of this year to the Fall, ceasing shut-offs for non-payment in compliancy with the emergency orders, and extending the period of time for which estimated billings would be issued to customers that have a “non report” meter in their residence (this is where the meter is continuing to measure water flows for consumption, but data is not being transmitted properly thru radio reads; typically a 1-2 month estimated read process would be observed as we are able to get into a residence to fix the radio read problem...this is now elongated to a period of 3-5 months of estimates, as we are not going into residences for this non-emergency purpose).

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**Item # 8**

Describe any changes to capital projects and related planning budgets the Utility has made or is planning to make in response to the effects of the pandemic.

**Response:**

The Company did have to defer one large capital project out of 2020 to 2021. That being the replacement of the Kessler Farm Tank in Nashua. The timing and delays associated with COVID-19 did not allow for that project to start early enough in the Spring to be completed during this year and be operational before winter started. As such, this project is now slated for a start in early 2021, and completion in the fall of 2021. In order to offset this deferral, several other projects for water main replacement and/or booster station upgrades, that were slated for 2021, have been moved forward into 2020, to rebalance the overall workload for capital projects for the two years, as a part of the Company's comprehensive an ongoing infrastructure replacement programs.



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**Item # 9**

Describe any supply chain disruptions the Utility is experiencing or expects may occur and the effects of such supply chain disruptions.

**Response:**

The Company has not experienced any supply chain disruptions, other than a temporary disruption in the ability to obtain some PPE supplies to maintain a full stock of those supplies (which has been fully rectified at this time). And, we have not been given any notice by key suppliers that a disruption in supply chain distribution is anticipated at this time. Please note that per information provided by the joint USEPA/AWWA webinar on June 10<sup>th</sup> that the Federal Government has deemed producers and suppliers of water treatment chemicals as essential businesses which has helped ensure that these businesses will remain open.

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**Item # 10**

Describe whether the Utility and/or its parent company has adequate access to capital or has been negatively affected in accessing the capital markets or has been downgraded by any credit rating services.

**Response:**

The Company did experience a delay in its ability to issue its annual Tax-exempt bonds into the market in April. The bonds were originally slated to price and close in the April 2-9 timeframe, but due to disruption in the bond markets from COVID-19, the bonds did not actually price and close until April 29. However, when they did sell in late April, the monetary impact on the issued bonds was very minimal, in that the bonds issued at that time were issued at an all-in TIC (total interest cost) of 4.29%, up from the equivalent experienced for bonds issued in April 2019 at an all-in TIC of 4.22%. And the difference in those rates could be solely attributed to the fact that the Company was rated as an A+ credit in April 2019, but as an A credit in 2020 (all due to liquidity concerns for the Company itself, and for the markets in general). The Company has had ongoing discussions with its primary bank during this COVID-19 period, as it relates to ongoing negotiations relating to the extension and renewal of its line of credit facilities. And, as rate relief and another bond issuance is pending (Docket No. DW 20-089) the Company had concerns about liquidity resources to continue to remain financially viable during COVID, and as such, applied for and received a PPP loan, which has accomplished the needed backstop for the Company and its ability to fully employ its workforce, and continue to provide full services for its customers.

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**Item # 11**

Describe incremental costs associated with the COVID-19 pandemic since the State of Emergency order, how the cost is calculated, cost to date, accounting treatment, impact on earnings, and proposed or planned rate treatment.

**Response:**

Schedules are attached detailing the incremental costs for supplies associated with COVID-19, as well as the cost of labor to maintain a full workforce during this pandemic, in a “ready state” to respond to and complete essential services to our customers. At this juncture and based upon the overall impact and nature of these expenditures, even though these costs have been individually tracked in work orders, the Company contemplates they will be recorded a period expenses in 2020, and no deferred treatment will be sought or required. This is due to the overall nature of the expenditures, their magnitude, and the rate structure that exists for the regulated utility company’s in our consolidated group. As an ROE component does not exist for our company’s, allowed and earned revenues are earmarked for three distinct buckets of cash flow needs: the CBFRR, the DSRR and the OERR. And, as the labor costs described in the attached, are a part of the base wages that would normally be inclusive on the OERR portion of allowed revenues, no special treatment would be required. Outside of labor costs, the specific incremental costs spent to date on PPE and supplies is less than \$10k. As such, without an ROE component and based upon our rate structure, there is currently no adverse impact on earnings of any material nature due to COVID-19.