

From: Stephanie Spyvee <sspyvee@hotmail.com>

Sent: Sunday, January 24, 2021 1:12 PM

To: PUC: <PUC@puc.nh.gov>

Subject: Comment on Docket DW 20-117 Hampstead Area Water Company, Inc. Request for Change in Rates

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Re: DW 20-117 Hampstead Area Water Company, Inc. Request for Change in Rates

Dear Members of the PUC,

My name is Stephanie Spyvee and I am a Hampstead resident with questions regarding the recent request for a rate increase by Hampstead Area Water Company.

Many people have expressed concern about the extraordinary change in billing for fire hydrants, and the increase in rates for residential customers, and I hope you will be examining the justification behind these proposals carefully to ensure that customers are treated fairly.

I would also like you to focus on the performance of HAWC in terms of water conservation and accurate reporting of data so that we can be assured that they are doing everything they can to maintain a robust system and be transparent with their customers.

From data available from Annual reports, they show a water loss of 12% in 2019. Some areas seem to perform much more poorly, and in some, more water is sold than is produced, which is either an error or some information is missing . Much of the information is out of date and hard to interpret and is inconsistent with data posted to NHDES OneStop database. Clearly the reporting is lacking in quality control and oversight.

The ATK-HAMP core water losses from Annual Reports:

	Produced amt(gallons)	Loss	Loss % from the annual report
2019	158,425,256	19,537,222	-12.3%
2018	166,556,709	27,661,302	-16.6%
2017	161,706,473	25,668,696	-15.9%
2016	154,980,389	19,553,876	-12.6%
2015	162,663,608	18,854,311	-11.6%

Note that the water loss tables in the annual reports are the losses for all HAWC water systems combined, and some of them are much worse, losing -73.7%¹ and some actually have negative losses (up to 92.6%)^{2,3} which is inexplicable.

¹ Kings Landing 2015

² The annual reports also report water purchased, but the reports do not seem to indicate any purchases.

³ Colby Pond 2015

I ask that the PUC take this opportunity to demand accurate and timely data reports in accordance with New Hampshire Code of Administrative Rules, Chapter Env-Wq 2100, Water Conservation; Use Registration and Reporting Part Env-Wq 2101, along with any correspondence between DES and HAWC regarding water losses. HAWC should provide a full explanation of their water loss mitigation efforts and how much they have improved before granting them the increase in ROE they feel they deserve. They are proposing a two-tiered rate system for residents using more than 4Ccf/month (a low threshold for a family of 4) to encourage water conservation, but when their system is losing over 19 million gallons a year, a homeowner taking shorter showers pales into insignificance.

Currently there is a lot of suspicion and mistrust of HAWC amongst townspeople that has been fostered by the lack of communication from the company. That could easily be dispelled by a more collaborative approach to questions on their long-term plans for expansion, what they are doing to fix leaks in their system, and how much water is being transferred between Hampstead and Atkinson, especially after homeowners have had their private wells dewatered by a HAWC well field. There is a sense that HAWC is taking the water from beneath people's feet and selling it back to them when they have no alternatives, since HAWC has a monopoly on piped water in Hampstead and a private well is not always an option. It would serve in everybody's best interest to have a better relationship between the Company and the Towns, and I hope the PUC can play a role by demanding better data quality and communication before approving any rate increases and profit margins.

Respectfully

Stephanie Spyvee