STATE OF NEW HAMPSHIRE

BEFORE THE

PUBLIC UTILITIES COMMISSION

Docket No. DW 20-156

PENNICHUCK EAST UTLITY, INC.

MOTION TO EXTEND MARCH 21, 2022 DEADLINE

NOW COMES, Pennichuck East Utility, Inc. (PEU), pursuant to Puc 203.04, and respectfully requests that the Commission approve an extension of the deadline in Order No. 26,586 to submit its calculation of the temporary-permanent rate recoupment as well as its rate case expenses. In support of this motion, PEU states as follows:

- 1. By Order No. 26,586, dated February 18, 2022, the Commission approved permanent rates for PEU. In that Order, the Commission also ordered that PEU file its calculation of the difference between temporary and permanent rates as well as its rate case expenses, along with documentation.
- 2. Since that order, PEU has been compiling that data and is almost finished. In finalizing the data and confirming the numbers, PEU has encountered difficulties. Some of the numbers are not tying out and PEU needs additional time to vet those numbers. Compounding that error is that, due to illness, key personnel required to conduct the vetting have been unavailable.
- 3. In light of the unforeseen illness and software difficulties and the importance that these reconciliation numbers be accurate, PEU respectfully requests an approximately two-week extension.

4. PEU believes that it has demonstrated that an "undue hardship or inconvenience" exists if an extension is not granted. Puc 202.04(c). PEU avers that extending the deadline by about two weeks to Friday, April 1st would not unduly burden the Commission or the parties because each will still be able to timely review the data filed.

5. Pursuant to Puc 203.04(b), PEU will make a good faith attempt to obtain other parties' positions and will file that summary of positions post haste.

WHEREFORE, PEU respectfully requests the Commission:

- A. Approve an extension of the filing deadline to Friday, April 1, 2022; and
- B. Grant such other and further relief as may be just and reasonable.

Respectfully submitted,

PENNICHUCK EAST UTILITY, INC.

By its Attorney,

Date: March 17, 2022

By: Marcia a Brown

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Certificate of Service

I hereby certify that a copy of the foregoing motion has been emailed this day to the Docket Related Service List for this docket.

Marcia A. Brown