



Marcia A. Brown
Attorney at Law

Environmental Law ▪ *Utility Law*

August 4, 2022

VIA ELECTRONIC DELIVERY

Suzanne G. Amidon, Esq.
Regulatory Division
Department of Energy
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

Re: DW 21-115 Pennichuck Water Works, Inc.
Special Contract with Anheuser-Busch, LLC
Responses to Department of Energy Set 3 Data Requests

Dear Suzanne:

Enclosed please find Pennichuck Water Works, Inc.'s responses to the Department of Energy's third set of data requests.

Regarding the attached bills, the Company would like to know whether the Department can issue its recommendation to the Commission without attaching the actual bills to its recommendation. As with the Company's response to DOE 1-4, the responsive customer-specific bills to DOE 3-1 would be protected from public disclosure due to the fact that Anheuser-Busch is a private company. In lieu of the bills, the Company believes the spreadsheets contain the data needed to corroborate the proposed bill credit and the Company would prefer, that if the Department attaches any documentation to its recommendation, that the spreadsheets only be used.

If bills are necessary to the Department's recommendation, then the Company will file a motion for protective treatment as well as provide the respective redacted (public and confidential) copies to the Department for DOE 1-4 and DOE 3-1.

Thank you in advance for your consideration and please let the Company know how it will proceed. It is a little confusing now that the Department exists because it is not clear how the Department is to rule on protecting confidential documents that it receives but that are not included in public filings to the Commission.

Very Truly Yours,

A handwritten signature in black ink that reads "Marcia A. Brown".

Marcia A. Brown

cc: Discovery Related Service List for DW 21-115



Marcia A. Brown
Attorney at Law

Environmental Law ■ *Utility Law*

August 8, 2022

VIA ELECTRONIC DELIVERY

Suzanne G. Amidon, Esq.
Regulatory Division
Department of Energy
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

Re: DW 21-115 Pennichuck Water Works, Inc.
Special Contract with Anheuser-Busch, LLC
Supplemental Response to Department of Energy 3-1 Data Request

Dear Suzanne:

Enclosed please find Pennichuck Water Works, Inc.'s supplemental response attachment to the Department of Energy's DOE 3-1.

This schedule differs from the one provided last week as follows:

1. Contract 5, Account 100020308, Column W, had the incorrect DW19-084 rate recoupment amount. The amount in the 8-4 reconciliation was the amount for Account 100012322 instead of the amount for Account 100020308.
2. Contract 5 – Both account reconciliation formulas inadvertently double counted the flushing credits. This has been corrected.

The Company apologizes for any confusion this change may cause for the Department's review. Thank you again for the Department's review of this reconciliation.

Very Truly Yours,

A handwritten signature in black ink that reads "Marcia A. Brown".

Marcia A. Brown

cc: Discovery Related Service List for DW 21-115

Pennichuck Water Works, Inc.
DW 21-115

Special Contract with Anheuser-Busch, LLC
Responses to DOE Data Requests – Set 3

Date Request Received: 7/25/22
Request No. DOE 3-1

Date of Response: 8/4/22; 8/8/22
Witness: Donald L. Ware

REQUEST:

Regarding the Reconciliation filed on July 22, 2022, please provide copies of all bills issued to Anheuser-Busch that are subject to the reconciliation. So that all bills are contained in one response, please include all bills provided with DOE 1-4 as well as those for March 2022 through July, 2022.

RESPONSE:

All Bills to A-B for service between July 1, 2021 and July 1, 2022 are attached to this data request. Additionally, I have attached a revised reconciliation of the two A-B accounts between Special Contract 4 and Special Contract 5 rates (Attachment DOE 3-1). The first tab (Actual Bill Reconciliation) provides a reconciliation for both accounts. Of note, the reconciliation submitted varies from the July 22, 2022 submitted reconciliation as follows:

1. The QCPAC Recoupment for DW20-020 detailed in the July 22, 2022 reconciliation showed the corrected DW20-020 Recoupment for each account (Column P) as opposed to the amount that was actually billed. (Column O). The QCPAC recoupment that was billed on both AB accounts was based on the QCPAC of 3.90% being applied against the Usage, Meter and the Contract fee. The 3.90% QCPAC should not have been applied to the Contract fee. The overbilled QCPAC recoupment that resulted from billing for 3.90% of the Contract fee for this account is being refunded to A-B in the form of a credit in A-B's August 2022 bill for this account.
2. The July 22, 2022 reconciliation did not account for flushing credits that were issued to A-B in its July 2021 and October 2021 bills for Account 100012322 and in the October 2021 bill for Account 100020308. That has now been accounted for in the attached.
3. Support of the original and correct QCPAC recoupments along with a calculation of the amount of the recoupment for each account based on Special Contract 4 and Special Contract 5 rates for DW20-020 and DW21-023 are found on the last four tabs of the attachment.
4. There was a missed billing period between 4/29/2022 and 5/2/2022 that occurred in the billing process, which is manual for AB. There was no bill issued for the consumption during this time frame. The consumption during this time period for both accounts will be billed to AB in their September 2022 bills. This consumption will be billed at the Contract 5 rates.

The total calculated reconciliation for both accounts based on the difference in Rates between Special Contract 4 and Special Contract 5 rates is (\$31,915.59) which is less than the (\$36,198.33) credit indicated in the Company's July 22, 2022 filing.

SUPPLEMENTAL RESPONSE: Please see the attached updated Supplemental Attachment DOE 3-1.



Marcia A. Brown
Attorney at Law

Environmental Law ■ *Utility Law*

August 17, 2022

VIA ELECTRONIC DELIVERY

Suzanne G. Amidon, Esq.
Regulatory Division
Department of Energy
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

Re: DW 21-115 Pennichuck Water Works, Inc.
Special Contract with Anheuser-Busch, LLC
Responses to Department of Energy Set 4 Data Request

Dear Suzanne:

Enclosed please find Pennichuck Water Works, Inc.'s response to the Department of Energy's fourth data request.

Regarding the attached bills, the Company considers them to be confidential and is prepared to file a motion for protective treatment if needed. Please let us know how the Department intends to use Attachment 4-1 so that I can determine if a motion is needed. Thank you.

Very Truly Yours,

A handwritten signature in cursive script that reads "Marcia A. Brown".

Marcia A. Brown

cc: Discovery Related Service List for DW 21-115

Pennichuck Water Works, Inc.
DW 21-115

Special Contract with Anheuser-Busch, LLC
Responses to DOE Data Requests – Set 4

Date Request Received: 8/17/22
Request No. Energy 4-1

Date of Response: 08/17/22
Witness: Donald L. Ware

REQUEST:

The Supplemental Reconciliation filed on August 15, 2022, p. 1 of the PDF, Note 11, indicates that a “QCPAC recoupment billing error is being reconciled with a credit to the August 2022 bills.”

Please provide a copy of the August 2022 bills that show the QCPAC-related credit issued to Anheuser-Busch.

RESPONSE:

Please find a copy of the August 2022 Anheuser-Busch August Bills along with the calculation of the credit issued on these bills that resulted from the DW20-020 CPAC recoupment billing error.

Pennichuck Water Works, Inc. has a good faith basis for seeking confidential treatment of the attached customer-specific bills pursuant to Puc 203.08. Kindly let the Company know how the Department intends to use the attached bills so that the Company can file a motion for confidential treatment if needed.