

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

PITTSFIELD AQUEDUCT COMPANY, INC.

Petition for Approval to Enter into a Long-Term Intercompany

Loan with Pennichuck Corporation

Docket No. DW 23-061

MOTION TO AMEND THE PETITION

NOW COMES Pittsfield Aqueduct Company, Inc. (“PAC” or “Company”), a corporation duly organized and existing under the laws of the State of New Hampshire and operating therein as a public utility subject to the jurisdiction of the New Hampshire Public Utilities Commission (the “Commission”), that hereby moves the Commission, pursuant to PUC 203.07, to amend the Petition filed on June 12, 2023 in accordance with the Procedural Order issued by the Commission on September 22, 2023 in Docket No. DW 23-061. Specifically, the Company requests that the Commission accept certain amendments to the Petition, Direct Testimony of George Torres, Schedule GT-4 and Schedule GT-5 to reflect updated information and certain typographical errors updated as a results of the Company’s responses to the New Hampshire Department of Energy (“Department”) discovery requests sets one and two dated July 6, 2023 and August 1, 2023. This motion requests amendment of the petition, testimony, and schedules so the Commission has the most accurate information that is also reflected in the Department’s technical statement filed on September 6, 2023. In support of this motion, the Company states the following:

1. PAC filed a petition for approval to enter into a long-term intercompany loan with Pennichuck of an intercompany loan on June 12, 2023.

2. The complete docket of this proceeding can be found at the Commission's website at: <https://www.puc.nh.gov/Regulatory/Docketbk/2023/23-061.html>

3. On June 13, 2023, the Commission issued a Letter of Acknowledgement in receipt of the Company's petition.

4. On June 15, 2023, the Department filed a notice of appearance including a notice of service list change.

6. On June 23, 2023, the Department filed an Assented-to Proposed Procedural Schedule in Docket No. DW 23-061.

7. On June 27, 2023, the Commission issued a Procedural Order approving the proposed procedural schedule.

8. On July 6, 2023, the Department submitted its first set of discovery requests to the Company, which the Company answered on July 17, 2023. The Company submitted supplemental answers on August 1, 2023 and August 22, 2023.

9. On July 11, 2023, the Commission issued a Procedural Order requesting that the Department's technical statement filing on September 6, 2023 include analysis of whether the Company's proposed financing is "routine."

10. On August 1, 2023, the Department and Company held a technical session to discuss the petition and discovery responses.

11. On August 1, 2023, the Department submitted its second set of discovery requests to the Company, which the Company answered on August 8, 2023.

12. On September 6, 2023, the Department filed its technical statement and attachments in Docket No. DW 23-061 with the required analysis stating supporting the proposed financing.

13. On September 22, 2023, the Commission issued a Procedural Order requesting that the Company file a motion to amend the petition and supporting documents to reflect updated information from the discovery responses filed as attachments to the Department's technical statement.

14. During technical session discussion and in response to Department discovery request DR 2-6, the Department and Company identified three assets that related to the Berry Dam and were deferred assets that were subsequently removed from the proposed intercompany loan reflected on the amended Schedule GT-5 (Bates 023, 024). This reduced the proposed intercompany loan amount from \$94,401 to \$80,308. The Petition (Bates 002, 004, 006, 007), Direct Testimony of George Torres (Bates 012, 014, 015), and Schedule GT-4 (Bates 021), were amended to reflect the revised loan amount and impact.

15. The Company also revised Schedule GT-4 (Bates 021) to reflect the proposed impact of the proposed financing on a single-family residential customer resulting in an average impact of \$0.51, which is also reflected in the Petition (Bates 006).

16. The Petition was also amended to remove two references to "CoBank" which were typographical errors on Page 3 (Bates 004). The Company has included both redlined and clean versions of the Petition, Direct Testimony of George Torres, and Schedule GT-5, as well as, a revised Schedule GT-4 for the Commission's review.

17. The Company therefore requests that the Commission accept the amended Petition, Direct Testimony of George Torres, and Schedules as the proposed amendments and

supplemental information provides the Commission with updated information related to the pending petition and will not cause undue delay.

18. The Company consulted with the Department, and the Department agrees and assents to this motion requesting amendment to the petition.

WHEREFORE, the Company respectfully requests that the Commission approve this Motion to Amend and accept the amended Petition, Direct Testimony of George Torres, Schedule GT-4 and Schedule GT-5 filed in accordance with the Procedural Order issued on September 22, 2023.


Respectfully submitted,

PENNICHUCK WATER WORKS, INC.

By Its Attorneys

RATH, YOUNG AND PIGNATELLI, P.C.

Dated: September 26, 2023

By: 
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Certificate of Service

I hereby certify that a copy of this motion was provided via electronic mail to the individuals included on the Commission's service list for this docket.

Dated: September 26, 2023



James J. Steinkrauss