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By email (<u>ClerksOffice@puc.nh.gov</u> and <u>andrew.j.harmon@energy.nh.gov</u>)

Daniel C. Goldner, Chairman NH Public Utilities Commission 21 S. Fruit Street, Suite 10 Concord, NH 03301-2429

Andrew J. Harmon, Hearings Examiner NH Department of Energy 21 S. Fruit Street, Suite 10 Concord, NH 03301

RE: Docket DRM 23-082 Request for public comment Rulemaking – EN 600 Rules for water service

Dear Chairman Goldner and Attorney Harmon:

HAWC offers the following comments for the Commission's consideration in response to its September 11, 2023, Order of Notice in this Docket, and as related to the Department of Energy's proposed En 600 rules for Water Service.

Both attorney Marcia Brown and Lakes Region Water Co., Inc. have submitted comments, and HAWC concurs with these comments. In addition to Attorney Brown's comments regarding PUC 605.04, HAWC adds its preference to not only extend the meter testing threshold to meet existing manufacturer warranties (20 years versus 10) but to also provide the option for utilities to replace meters at such time instead of testing. HAWC has found the number of vendors that test has decreased, and by the time a meter is removed to test, a temporary meter is installed, the tested meter is returned and re-installed (if it still functions properly) that it may be more cost effective to replace the meter with a new one.

HAWC joins the comments of Lakes Region particularly for HAWC's eligibility to use the generic methodology to determine rates of return on equity developed in Commission Docket No. IR 19-005.

Thank you for your consideration of these comments. Please contact me if you have any questions.

Very truly yours,

Anthony S. Augeri, Esq. General Counsel

HT e cc: service list