

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

Docket No. DW 17-128

Pennichuck East Utilities, Inc.
Request for Change in Rates

**MOTION FOR WAIVER OF PUC 1203.05(b) FOR
IMPLEMENTATION OF STEP RATE INCREASE**

NOW COMES, Pennichuck East Utilities, Inc. (the “Company” or “PEU”), in accordance with N.H. Admin. Rule Puc 201.05, and hereby moves the New Hampshire Public Utilities Commission (the “Commission”) to waive N.H. Admin. Rule Puc 1203.05(a) regarding the implementation of the step rate increase approved by the Commission’s Order No. 26,179 (October 4, 2018) (the “Order”). In support of its motion, PEU states as follows:

1. Puc 1203.05 provides that, “unless a utility petitions the commission for a waiver all rate changes implemented as a result of a commission order ... shall be implemented on the basis of service rendered on or after the effective date of the approved rate change.”

2. The Order approved the permanent rate increase described by the parties in the Settlement Agreement filed on July 18, 2018 (the “Settlement Agreement”). The Order also approved PEU’s Motion for Waiver to allow permanent rates to be implemented on a bills-rendered basis as of January 8, 2018.

3. The Order also approved the step increase described in the Settlement Agreement. By accident, mistake or misfortune, PEU failed to seek a waiver of PUC 1203.05(a) regarding implementation of the step increase. As provided for in the Settlement Agreement, the step

increase is “effective as of the date of the Commission order approving [the Settlement Agreement]. Settlement Agreement at 10.

4. PEU is requesting that the step rate also be implemented on a bills-rendered basis on or after November 16, 2018 because it represents the first full monthly bill that will be issued following the Commission’s Order. In accordance with Puc 1203.05(c), implementing the step increase on a bills-rendered basis:

- a. will be less confusing to customers. By using a bills-rendered basis, the step increase would be applied to the entire month rather than require a pro-ration of bills;
- b. will cost less for the Company; and
- c. will give customers adequate notice of the changes in rates applicable to their usage.

4. The only potential negative would be that the Company would lose revenue by implementing temporary rates on a bills-rendered basis. The Company believes the minimal loss of revenue is outweighed by the benefits the Company would see by implementing the step increase on a bills-rendered basis. Thus, the Company is willing to forego some amount of revenue to avoid confusing its customers and for the gains in efficiency to the Company if implemented on a bills-rendered basis.

5. For the reasons stated above, the balance of the factors for waiver under Puc 1203.05 supports waiver. The granting of PEU’s request is in the public interest and will not disrupt the orderly and efficient resolution of this proceeding.

6. The parties to the settlement agreement have been contacted but were all unavailable to provide their assent prior to the filing of this motion.

WHEREFORE, PEU respectfully requests that the Commission:

- A. Grant this Motion for Waiver of Puc 1203.05 (a); and
- B. Provide such other relief as is just and equitable.

Respectfully submitted,

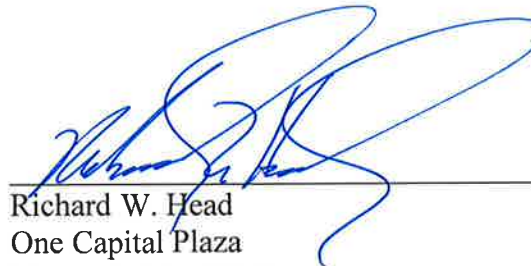
PENNICHUCK EAST UTILITIES, INC.

By its Attorneys,

RATH, YOUNG AND PIGNATELLI, PC

Date: October 9, 2018

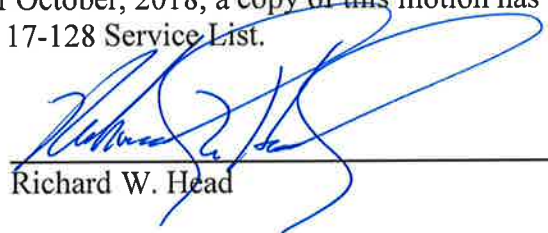
By:



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Certificate of Service

I hereby certify that on this 9th day of October, 2018, a copy of this motion has been served electronically to the Docket No. DW 17-128 Service List.



Richard W. Head