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December 19, 2019

NHPUC 20DEC'19AM11:01

Debra A. Howland
Executive Director
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301

**Re: DW 17-165, Abenaki Water Company, Inc.
Commission Staff Recommendation for Recovery of Affiliate Charges
Request for Opportunity to Respond**

Dear Ms. Howland:

Please accept this letter as Omni Mount Washington, LLC's (Omni) request for the opportunity to respond, by January 13, 2020, to Commission Staff's latest filing in the above-captioned proceeding. Pursuant to Puc 201.05, Omni asks that the New Hampshire Public Utilities Commission (PUC or Commission), to the extent necessary, waive its filing requirements under Puc 203.02 inasmuch as doing so will not disrupt the orderly and efficient resolution of this matter.

On December 11, 2019, Ms. Descoteau filed a letter on behalf of Commission Staff that begins by saying that the "purpose of the letter is to explain why the Affiliate Admin and General Salaries cost of \$60,604 reported in the NHPUC Audit Report, pages 2 – 3 of the NHPUC Audit Report issued September 6, 2018 is different than the amount included in the O&M Expense of the Revenue Requirement filed with the Settlement Agreement on November 5, 2018." She closes by saying "Staff renews its August 15, 2019, recommendation to authorize Abenaki to recover the \$26,369 in rate case expenses related to New England Service Company as those expenses are not included in the Abenaki's approved revenue requirement, as evidenced above."

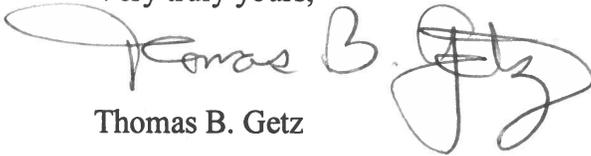
The Commission has not adopted a procedural schedule for resolving the dispute among the parties concerning the propriety of allowing Abenaki Water Company, Inc. to recover as rate case expenses charges it made to its affiliate service company. Most recently, in Order No. 26,312 (November 27, 2019) it simply said that it would not address Omni's position on outstanding rate case expenses, i.e., the New England Service Company charges, in that order. The Commission had previously carved the issue out of Order No. 26,295 (October 1, 2019) when it directed Abenaki to file a response within 14 calendar days, which Abenaki did on October 11, 2019.

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Commission Staff has now decided to weigh in once again on the issue, which was not contemplated in the Commission's October 1, 2019 Order. In light of Staff's unscheduled filing and new arguments defending its original recommendation, Omni asks for the opportunity to respond generally as a matter of fairness and specifically in light of Staff's special dual role as both participants in the proceedings advocating a particular outcome and advisers to the Commission. Given the impending holidays and the nature of the arguments, Omni asks that it be given until January 13, 2020 to file a response.

An original and six copies of this letter will be hand-delivered to the Commission. Electronic copies have been sent to the Executive Director, the Office of the Consumer Advocate, and the Service List.

Very truly yours,

A handwritten signature in black ink, appearing to read "Thomas B. Getz". The signature is stylized with a large, sweeping initial "T" and a long, horizontal flourish extending to the right.

Thomas B. Getz

TBG:smm