

February 26, 2021

VIA ELECTRONIC FILING

Debra A. Howland
Executive Director
Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

RE: Docket No. IR 20-089, New Hampshire Public Utilities Investigation into the Effects of the COVID-19 Emergency on Utilities and Utility Customers

Dear Director Howland:

Aquarion Water Company of New Hampshire (“Aquarion” or the “Company”) submits this response in compliance with the Commission’s Order of Notice dated June 4, 2020.

The Order of Notice states:

On or before June 30, 2020, and no later than the 30th day of every month following, until otherwise ordered by the Commission, each Utility shall file written responses and updates in subsequent months to the following requests for information. The responses should be current as of the end of the month immediately preceding. Additionally, these responses will be submitted regardless of whether the Utility has previously provided written responses to similar requests from Commission Staff:

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1) Provide information regarding changes in payment behavior or patterns and account receivables levels since the declaration of the State of Emergency on March 13 and the Governor's Emergency Order #3 issued on March 17. Such information should be provided for each utility rate class.

Response: Please refer to the tables below:

\$ A/R over 60 days				
Month	Customer Class	2021	2020	2019
	Residential	\$45,346	\$27,760	\$19,616
	Commercial	\$12,866	\$7,237	\$3,512
	Industrial	\$1,760	\$681	\$539
January		\$59,972	\$35,678	\$23,667
	Residential		\$28,329	\$19,322
	Commercial		\$6,737	\$3,919
	Industrial		\$1,303	\$135
February		\$36,368	\$23,376	
	Residential		\$29,905	\$21,912
	Commercial		\$8,220	\$4,183
	Industrial		\$1,017	\$95
March		\$39,143	\$26,189	
	Residential		\$37,260	\$20,472
	Commercial		\$9,056	\$5,048
	Industrial		\$1,295	\$461
April		\$47,610	\$25,981	
	Residential		\$43,953	\$22,711
	Commercial		\$10,796	\$5,400
	Industrial		\$2,231	\$846
May		\$56,980	\$28,957	
	Residential		\$48,066	\$21,515
	Commercial		\$11,408	\$5,133
	Industrial		\$3,408	\$1,119
June		\$62,882	\$27,767	
	Residential		\$45,797	\$20,879
	Commercial		\$12,252	\$4,974
	Industrial		\$3,221	\$645
July		\$61,270	\$26,498	
	Residential		\$52,567	\$18,760
	Commercial		\$16,505	\$5,293
	Industrial		\$2,333	\$908
August		\$71,405	\$24,961	
	Residential		\$58,163	\$16,979
	Commercial		\$12,608	\$5,538
	Industrial		\$1,545	\$591
September		\$72,316	\$23,108	
	Residential		\$57,477	\$17,656
	Commercial		\$11,926	\$6,933
	Industrial		\$1,733	\$1,263
October		\$71,136	\$25,852	
	Residential		\$55,618	\$22,630
	Commercial		\$12,892	\$8,801
	Industrial		\$1,575	\$1,878
November		\$70,085	\$33,309	
	Residential		\$47,767	\$29,434
	Commercial		\$12,123	\$7,944
	Industrial		\$1,989	\$2,129
December		\$61,880	\$39,507	
Average YTD		\$59,972	\$57,229	\$27,431

\$ A/R over 90 days				
Month	Customer Class	2021	2020	2019
	Residential	\$35,081	\$18,678	\$13,834
	Commercial	\$11,204	\$5,690	\$2,471
	Industrial	\$1,290	\$505	\$138
January		\$47,575	\$24,872	\$16,443
	Residential		\$20,487	\$12,984
	Commercial		\$5,267	\$2,652
	Industrial		\$404	\$16
February		\$26,158	\$15,652	
	Residential		\$21,428	\$13,865
	Commercial		\$6,389	\$3,349
	Industrial		\$176	\$91
March		\$27,992	\$17,304	
	Residential		\$25,832	\$14,574
	Commercial		\$6,905	\$3,784
	Industrial		\$940	\$95
April		\$33,677	\$18,452	
	Residential		\$33,626	\$13,614
	Commercial		\$8,727	\$3,948
	Industrial		\$1,209	\$69
May		\$43,562	\$17,631	
	Residential		\$36,995	\$14,668
	Commercial		\$9,540	\$4,039
	Industrial		\$2,077	\$336
June		\$48,613	\$19,043	
	Residential		\$35,101	\$14,406
	Commercial		\$9,519	\$4,155
	Industrial		\$2,336	\$340
July		\$46,956	\$18,901	
	Residential		\$35,548	\$12,701
	Commercial		\$10,049	\$4,518
	Industrial		\$1,873	\$604
August		\$47,470	\$17,823	
	Residential		\$43,574	\$11,823
	Commercial		\$10,648	\$4,243
	Industrial		\$1,252	\$92
September		\$55,474	\$16,158	
	Residential		\$42,641	\$11,119
	Commercial		\$9,767	\$5,239
	Industrial		\$1,324	\$521
October		\$53,732	\$16,879	
	Residential		\$40,781	\$12,537
	Commercial		\$9,293	\$6,544
	Industrial		\$1,090	\$1,075
November		\$51,164	\$20,156	
	Residential		\$37,759	\$17,688
	Commercial		\$9,456	\$6,184
	Industrial		\$1,134	\$1,429
December		\$48,349	\$25,301	
Average YTD		\$47,575	\$42,335	\$18,312

2) Provide the following data for each utility rate class:

- The number, and percentage, of customers who made partial or no payment in March, April, and May of 2019 and 2020.
- The number, and percentage, of customers who made partial or no payment in March, April, and May of 2019 and 2020 and did not have an outstanding balance during the prior six months.

Response: Please refer to the tables below for 1) the number and average percentage of customers who made partial or no payment in the months from January to December of 2019 and 2020 and January 2021 and 2) the number and average percentage of customers who made partial or no payment in the months from January to December of 2019 and 2020 and January 2021 and did not have an outstanding balance during the prior six months.

Customers who made partial or no payments			
Month	2021	2020	2019
Jan	323	430	406
Feb		405	360
March		470	404
April		479	420
May		459	439
June		469	449
July		476	425
August		443	363
September		458	366
October		430	438
November		441	502
December		406	476
Average YTD	323	447	421
% of customers (average)	3.2%	4.5%	4.2%

Customers who made partial or no payments and did not have an outstanding balance			
Month	2021	2020	2019
Jan	9	157	180
Feb		130	136
March		198	195
April		144	204
May		82	182
June		50	253
July		10	149
August		4	155
September		35	245
October		226	336
November		78	82
December		33	59
Average YTD	9	96	181
% of customers (average)	0.1%	1.0%	1.8%

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3) *Describe any programs or initiatives undertaken to assist customers specifically as a result of the COVID-19 pandemic, the State of Emergency, Emergency Order #3, and the related stay-at-home restrictions.*

Response: The Company has in place the same programs and initiatives described in its January 29, 2021 submission at which time it was reported that in response to the COVID-19 pandemic, effective March 16, 2020, the Company has waived all late and reconnection fees, and is not disconnecting any customers regardless of their payment status through the end of the moratorium which expired on October 12, 2020, and as long as customers are enrolled in a covid-19 payment plan. Prior to the COVID-19 pandemic, the Company had implemented a Voucher Program to provide a benefit to customers who may be struggling with cost of basic needs where a credit of \$50 is applied to a customer's bill when approved. In May, the Company began offering a new program that provides a flexible, adaptable payment plan for any customer who requests it during the pandemic for up to 24 months. Residential and commercial customers can enroll in this program through March 31, 2021. Specifically, the flexible payment plan:

- Is not based on financial need;
- Does not require an initial down payment;
- Does not charge fees or interest from time of pandemic to end of payment plan;
- Waives any fees or interest in the calculation of the monthly payment amount;
- Customers who identify as "hardship" can self certify, which provides a 60 day suspension from shutoffs until certification can be verified by our customer assistance program vendor, Wellspring.

4) *Provide a detailed description of customer outreach undertaken to date.*

Response: The Company has proactively communicated changes to its policies to assist customers during this critical time in various ways as follows:

- Email communications to customers (3/16, 3/31, 5/1, 6/5, 10/28);
- Bill inserts during the month of March and April (started 3/18); Website updates (including a Q & A) and continuous social media posts;
- Letters from Aquarion's President to Town officials updating them on what the Company is doing to assist customers, cessation of non-essential work (3/17, 3/27, 4/28);
- Updates on overall operations were provided to North Hampton Select Board on 6/8; Rye Select Board on 7/13; Hampton Town Manager and North Hampton Town Administrator on 9/28; and Hampton Select Board on 9/28
- Issued notice to advise building owners about flushing building plumbing systems to mitigate any stagnant water issues based on the New Hampshire Department of Environmental Services' flushing guidance (5/18);
- IVR (phones system) updated to start with our commitment to assist customers with flexible payment arrangements and information on the Customer Assistance Program.

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- Reminder notices to customers who are past due and don't have a payment arrangement began week of 7/13. Notice provides information on payment arrangement options with no interest or fees for past due balances.
- Letters were sent to all customers with a past due balance on 10/1 and email on 10/28 reminding them of the end of the moratorium and to encourage customers to call and make a payment arrangement.
- All customer invoices contain an "onsert" message describing the payment and hardship programs available.

The customer programs and communications described in response to items 3 and 4 above are in line with the commitments made by Aquarion in the Agreement submitted to the Commission on September 10, 2020 in Docket No. IR 20-089.

5) *Describe the Utility's review and evaluation of best practices and successful initiatives undertaken in other states.*

Response: As part of the Eversource family, the Company is constantly reviewing and evaluating best practices and successful initiatives undertaken in other states. The measures and protocols implemented to date are in line with Aquarion's understanding of current best practices to safeguard customers and employees and are implemented across Aquarion's operations in all three states in Connecticut, Massachusetts and New Hampshire where Aquarion does business.

6) *Describe whether the Utility has updated its sales forecasts in light of the pandemic and its effects on the economy*

Response: Aquarion has not updated or changed its sales forecast due to the uncertainty surrounding the duration of the 'stay at home' advisories and the closures of non-essential businesses, along with the uncertainty of the sales impacts due to these mitigation initiatives. Aquarion experienced an increase in residential consumption during the period March through December 2020 when compared to the same period in 2019 while commercial and public authority consumption declined. Total consumption in 2020 increased compared to consumption in 2019. However, sufficient time has not passed for the Company to discern how customer consumption patterns will be affected on a going forward basis and would be appropriately factored into sales forecasts.

7) *Describe any operational changes the Utility is making or planning to make in response to the effects of the pandemic, including changes in budgets or personnel.*

Response: The Company has not implemented any additional changes beyond those described in its January 29, 2021 submission at which time it was reported that the Company has implemented Business Continuity Plans ("BCPs"), designed as part of its pandemic emergency response protocol, to cover work arrangements affected by the COVID-19 pandemic, which include the ability to work

remotely across the Company. To date, implementation of the BCPs has resulted in minimal disruption to the Company's operations in response to the Pandemic.

Measures in place for customer safeguards:

- Curtailed nonessential and non-emergency customer service appointments through end of July. Most field work has resumed effective August 1, 2020;
- Ensure all field resources and support staff continue to be ready for service disruption not related to COVID-19;
- Implement work safety plans;
- Provide enhanced training on proper use of personal protection equipment ("PPE");
- Implemented contact tracing protocol.

Measures in place for employee safeguards:

- Implement measures and guidelines for employees to ensure that the Company workforce remains ready to serve customers and maintain essential service;
- Postpone employee travel by switching to virtual meetings instead of face-to-face meetings and business gatherings;
- Have employees whose job responsibilities allow them to work remotely to do so, reducing the number of employees interacting with each other in person;
- Create new procedures—including work safety plans and cleaning protocols—so that employees who must work at the Company's critical facilities and perform field work can do so safely at increased distances while minimizing risks.
- Re-entry into the workplace training developed; all employees went through training by August 31, in preparation for returning to the workplace.

No significant variances to budgets due to the pandemic for 2020:

- No employee furloughs, payroll or compensation actions, or changes to any labor agreements in response to the pandemic;
- Labor resources have been shifted from suspended work to other maintenance work, primarily hydrants and production facilities and enhanced leak detection;
- No significant disruptions to the supply chain, including PPE;

8) *Describe any changes to capital projects and related planning budgets the Utility has made or is planning to make in response to the effects of the pandemic.*

Response: No material changes were made as a result of the pandemic and there have been no cancellations or delays of any capital projects categorized as a "reliability projects" or "asset replacement". All major capital projects were completed as planned.

9) *Describe any supply chain disruptions the Utility is experiencing or expects may occur and the effects of such supply chain disruptions.*

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Response: The Company has not experienced significant disruptions to the supply chain, including PPE.

10) Describe whether the Utility and/or its parent company has adequate access to capital or has been negatively affected in accessing the capital markets or has been downgraded by any credit rating services.

Response: The Company and/or its parent has not had any problems accessing the capital markets and as the markets have greatly improved over the last couple of months, the Company and/or its parent has not been negatively impacted. There have been no ratings changes for the Company and/or its parent from any of the credit rating services since the pandemic began.

11) Describe incremental costs associated with the COVID-19 pandemic since the State of Emergency order, how the cost is calculated, cost to date, accounting treatment, impact on earnings, and proposed or planned rate treatment.

Response: In a memo to Commissioners filed on August 18, 2020 in this investigation docket, Commission Staff recommended that the Commission authorize electric, natural gas, water, and wastewater utilities, as well as the New Hampshire Electric Cooperative (collectively, Utilities) to create a regulatory asset for incremental bad debt and waived fees related to the COVID-19 pandemic.

Specifically, Staff recommended the Commission should issue an order addressing regulatory accounting for COVID impacts on the Utilities financing that:

- 1) Authorizes electric, natural gas, water, and wastewater utilities, and NHEC, to create a regulatory asset for waived fees and incremental bad debt related to the pandemic.
- 2) Require each utility to maintain detailed accounting records of waived fees and incremental bad debt for Commission audit and review in a future proceeding when the utility requests recovery.
- 3) Require each utility to identify cost savings associated with the impacts of COVID and to track and report COVID cost savings since March 31, 2020, to be included in monthly COVID reporting.
- 4) Require each utility to identify and track any loans, grants, assistance or benefits received in connection with COVID, regardless of form or source, that would offset any COVID related expenses, to be included in monthly COVID reporting.

On November 13, 2020, the Staff modified its recommendation arguing that waived fees should not be included in any regulatory asset. Various utilities responded to that modification on December 4, 2020 and on December 16, 2020. The Staff maintained its modified recommendation. The Commission has yet to act on the recommendation or responses. Absent an Order and to be responsive to this request for information, Aquarion is providing the following updates to the information the Company has provided in previous monthly reports.

The Company anticipates incurring incremental costs associated with COVID 19 associated with bad debt expense, working capital costs, and other, as described below.

A. Bad Debt Expense

In order to determine the amount of incremental bad debt expense attributable to COVID-19, the Company will compare the actual bad debt expense against the bad debt expense authorized in base rates.

On a monthly basis, the Company will compare its actual level of bad debt expense recorded in accordance with Generally Accepted Accounting Principles to the amount in base rates. As of January 31, 2021, there has been no incremental bad debt expense recorded as it may take longer than a couple of months to experience the impact of the pandemic on bad debt expense. The Company recommends the creation of a regulatory asset where amounts recorded for expense in excess of the baseline amount would be deferred, subject to future recovery.

Under this methodology, the Company would submit a report to the Commission documenting actual net charge-offs over the COVID-19 cost deferral period to the baseline allowance for the same time, with the difference representing the incremental bad debt cost resulting from COVID-19.

In this way, the Company would establish the regulatory asset based on its accounting for bad debt expense, which represents the Company's best estimate of the level of future charge-off activity. However, the Company would ultimately recover only the actual incremental net charge-offs based on actual experience with customer payments that is incremental to the baseline of net charge-off activity, once typical collection activities resume. Net charge-offs for the Company are expected to decrease initially (due to the prolonged moratorium) and then to increase sharply at a later date once typical collection activities resume. The deferred payment plans allow for customers to pay their arrearage balances over a period of up to 24 months, which means it could take until late 2021 or even later for the Company to experience an increased spike in charge-offs, depending on what the future brings for a prolonged impact of COVID-19 and customers' long-term payment habits.

B. Working Capital Costs

The Company anticipates increased incremental working capital costs as a result of increasing accounts receivables balances caused by reduced customer payment levels. In order to calculate the incremental working capital costs, the Company will update the lead lag study approved in the most recent rate case, by adjusting the average lag in days from the date bills are sent to customers to the date bills are paid by customers. This calculation will produce a change in the revenue lag exclusively as a function of the increased net accounts receivables balance. The Company will subtract the cash working capital amount that is currently recovered in base rates from the updated cash working capital amount. The resulting difference will be multiplied by the pretax weighted average cost of capital, as approved in the Company's most recent rate case and revised to reflect current tax rates to determine the incremental cash working capital cost associated with the increased

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accounts receivables balances experienced as a result of the pandemic. As of January 31, 2021, there has been no incremental cash working capital costs incurred as the 12 month rolling revenue lag as of January 31, 2021 is shorter than the revenue lag in the last rate case due to the fact that most customers were on quarterly billing in 2011, the test year for the previous rate case. However, as customers delay payment further in future months, collection days will become longer. The Company recommends the creation of a regulatory asset where the incremental working capital amounts would be recorded and subject to future recovery.

C. Other Costs

In addition to revenue shortfalls associated with foregone fees, such as late payment and reconnection fees, the Company is incurring incremental costs for PPE to keep employees safe while they work to operate the system and to clean work facilities to prevent the spread of the virus. The Company created a specific work order to track certain COVID-19 related costs. As of January 31, 2021 total related costs are less than \$5,000.

Consistent with the Commission's March 17, 2020 secretarial letter, this submission is being provided electronically only. Should you have any questions concerning the foregoing, please contact me at your convenience at 203-337-5933.

Sincerely,



Debra A. Szabo
Director, Rates and Regulation