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Environmental Law ▪ *Utility Law*

August 26, 2024

VIA ELECTRONIC DELIVERY
Molly Lynch, Esq.
Staff Attorney/Hearings Examiner
Department of Energy
21 South Fruit St, Suite 10
Concord, NH 03301

Re: [REDACTED] – Customer Complaint – CPT 2024-006
Pennichuck Response to DOE Second Set of Questions
CONFIDENTIAL CUSTOMER INFORMATION

Dear Attorney Lynch,

On August 20, 2024, the Department asked a second set of questions of the Company. Those questions and the Company's responses are below.

Question 1: Please confirm the size of the meter in question? Is it a 5/8" meter as indicated in Attachment B?

Answer: Yes, the size of the meter is 5/8-inch.

Question 2: According to Pennichuck's records, please confirm the date on which the meter in question was first installed at the customer's residence.

Answer: The meter was originally installed at property location on 10/07/2005.

Question 3: Please provide all dates on which the meter in question was previously tested, including the date on which the Customer's meter was last tested and/or calibrated prior to the filing of this complaint.

Answer: The meter had not been tested since installation at this property prior to high usage report. The Company maintains a meter testing cycle, however, the pandemic disrupted that cycle. The Company has resumed that cycle prioritizing its older meters first. That resurrection of the meter testing program occurred in the 2nd quarter of 2022 with a slow start due to a temporary shortage of meter technicians upon that restart. Although Pennichuck is still in a bit of catch-up mode, as of late 2023, the meter testing program was back up to full force.

Question 4: Referring to [REDACTED] email dated July 15th (Attachment D), was the meter in question removed from the home? If so, on what date and was a new meter installed at the Customer's residence? Please explain. If yes, what is the current location of the old meter? Can it still be identified as the meter in question and tested? Please explain.

Answer: The meter was removed from the property on June 14, 2024, and tested at the Company's facility on June 17, 2024. The meter is currently set aside at the Company's Operations center because [REDACTED] had interest in witnessing another test of the meter. The serial number is the identifier that this was installed at property but also meters are tagged with the address that they are removed from until testing is completed. That is the case with [REDACTED] meter. When there is a high bill in question, the meters are set aside after testing in case other testing or review is required. After speaking with [REDACTED] on July 9, 2024, and receiving the first email from DOE that afternoon, Tara King called the Meter Supervisor to ensure that the Company continued to hold this meter aside until this matter is resolved. After this matter is resolved, the meter will be released back to stock because the test demonstrated that it is still functioning within the parameters of the rules.

Question 5: On page 2 of its response, the Company states: "The meter test results demonstrate that the meter is within the prescribed accuracy parameters under the DOE's rules." Please identify the specific rule(s) being referenced. En 605.03 and En 605.03(d). Also, please specifically explain in detail why the results show that the meter was operating in accordance with the required parameters.

Answer: Based on EN 605.03 (d), a meter shall be determined inaccurate if the percent registration exceeds 103% or is less than 97% or the registration at the minimum flow exceeds 103% or is less than 90% as well as EN 605.03 (e), the percent error of registration shall be taken as the algebraic sum of the errors at the intermediate and maximum rates of test flow as set forth in Table 6.5.1 and divided by 2. The meter removed from the customer's residence on June 14, 2024, when tested on June 17, 2024 indicated the High Flow of 98% and Intermediate Flow of 100%, therefore resulting in a percent error of registration of 99%. With the Low Flow result of 98%, this meter passed at all flow levels as an accurate in the recording of water flows through the meter, as the low flow did not exceed 103% nor was less than 90% as required under the rules. The percent error registration did not exceed 103% nor was less than 97%.

Should the Department request any additional information from Pennichuck, the Company will promptly respond. Thank you.

Very Truly Yours,



Marcia A. Brown

cc: Customer of CPT 2024-006
John Boisvert, Pennichuck
Tara King, Pennichuck