DPU 1-3: Refer to the prefiled testimony of John E. Alden, Jr., JEA-1, at 4 and proposed M.D.P.U. No. 13, Original Sheet 4, Volumetric Rates and Original Sheet 5, Customer Charges. Please provide:

(a) the number and type of meters that served Northfield Mount Hermon School ("NMH") at its Northfield Campus as of its sale in 2009;

(b) the number and type of meters that currently serve the portion of the Northfield Campus owned or operated by the D.L. Moody Center; and

(c) the number and type of meters that currently serve the portion of the Northfield Campus owned or operated by Thomas Aquinas College.

Response: (a) There were 42 meters servings NMH's Northfield Campus in 2009.

Type	Number
5/8"	19
1"	12
1 1/2"	4
2"	6
3"	1

(b) There are 14 meters servings The Moody Center.

Type	Number
5/8"	10
1"	3
1 1/2"	0
2"	1
3"	0

(c) 29 meters serve Thomas Aquinas College. In 2019 a new meter was was installed to split a building's service from another metered building.

Type	Number	
5/8"	10	(1 new meter service installation in 2019)
1"	9	
1 1/2"	4	
2"	5	
3"	1	

DPU 1-4: Refer to the prefiled testimony of David M. Fox DF-1, at 4, and Sch. DF-5. Please:

(a) provide complete and detailed documentation, including a narrative explanation, for the $35,000 annual payment from NMH;

(b) explain whether the $35,000 annual payment from NMH was assessed in addition to a volumetric rate and/or a customer charge

(c) explain why the annual payment of $35,000 from NMH is no longer justifiable; and

(d) explain the Company's rationale for not proposing a similar payment from the customers that currently own or operate the Northfield Campus.

Response: (a) Given that in 2012, when the last rate increase was filed, it was anticipated that NMH would no longer make its annual gift of $35,000 that was being volunteered by NMH due to the absence of a major customer to replace the revenue lost when NMH left the Northfield Campus, it was then assumed that the purchasers of the campus would be increasing their consumption, offsetting the loss of NMH's $35,000 gift. After the 2012 rate filing, it was understood that the Northfield Campus businesses would not yet be gearing up, and NMH made the determination to continue its $35,000 annual gift. Given that Thomas Aquinas College is now in operation, the $35,000 gift will not be made in the future and it will be offset by revenue from Thomas Aquinas College as they grow their operation.

(b) The $35,000 annual payment from NMH was, as explained above, not related to volume, and was a payment voluntarily made by NMH and was not assessed by the Company. NMH has made volumetric charges for the several residences that it continues to own and which are occupied by employees of NMH.

(c) As stated in (a) above, the $35,000 payment by NMH has been a gift to help keep the ENWC financially viable given the absence of a major customer. Thomas Aquinas College's actual start-up of operations now gives ENWC a potentially major customer.

(d) See (a), (b) and (c) above. Of the customers that currently own or operate the Northfield Campus, Thomas Aquinas has gone into operations and will be paying a volumetric charge. Note that the $35,000 payment was not required by Company rates or general ratemaking principles.

DPU 1-7: Refer to the prefiled testimony of John E. Alden, Jr., JEA-1, at 4. Please describe the "long history of the Rustic Ridge and its connection to D.L. Moody and the Northfield campus."

Response: Shortly after D.L. Moody founded the Northfield Seminary in 1879 in East Northfield and the Mount Hermon School for Boys in 1881 in Gill, he began summer religious conferences on the Northfield Campus. These assemblies became very popular and led to the establishment of a summer cottage community known as the Rustic Ridge, located on a hill just east of the Northfield Campus. Devoted followers of D. L. Moody returned every year, for decades, to attend the "Northfield Conference" gatherings held on the Northfield Campus and to summer at the Rustic Ridge, a dense cluster of seasonal cottages.

The Rustic Ridge is comprised of 4 contiguous areas of small parcels, surveyed 1901 -1904, and most of the parcels are ¼ acre or less. Parcels in the first 2 tracts quickly sold to conference attendees at a rate of 1¢ per square foot, and the average lot cost about $100. Parcels in the 3rd and 4th the tracts (Pine Grove Addition and South Addition) were leased in the early 1900s by the Northfield Seminary to conference attendees who built cottages on them. Annual rental for a 100' X 100' lot was a modest $6 per year paid to the Northfield Seminary. These 20 leased parcels were conveyed by NMH to the leasing families in 1976 at an agreed price of $500 per acre.

The Rustic Ridge Association was created by the summer residents in 1907. That year, association members realized the summer colony was outgrowing its spring fed water supply and asked the Northfield Seminary for water from the school's reservoir. The Northfield Seminary granted their request and installed a system of surface pipes throughout the Rustic Ridge.

A kinship with D.L.Moody, the Northfield Campus, and NMH is still evident among current Rustic Ridge summer residents. Several of the summer cottages continue to be owned by members of the same family that originally constructed them in the early 1900s.

DPU 1-9: Refer to the prefiled testimony of John E. Alden, Jr., JEA-1, at 4, lines 16-19, and proposed M.D.P.U. No. 13 Original Sheet 4. Please provide:

(a) the number of "Seasonal-Ridge Customers";

(b) the number of Year-round Customers"; and

(c) the number of "Seasonal (Non-Ridge) Customers."

Response: (a) 51

(b) 240

(c) 0

A few of the 51 "Seasonal-Ridge Customers" own more than one summer home.

A few of the 240 "Year-Round Customers" have multiple meters.

DPU 1-11: Refer to the prefiled testimony of John E. Alden, Jr., JEA-1, at 5, lines 2-4. Please quantify and describe the East Northfield Water customers that are (1) individually metered and (2) sub-metered.

Response: (1) ENWC has 287 meters in use, of these 14 are billed to The Moody Center and 29 are billed to Thomas Aquinas.

(2) Additionally we have three (3) master meters for the entire Ridge service area (51 customers).

DPU 1-15: Refer to prefiled testimony of David M. Fox, DF-1, at 3, lines 18-19. Please provide complete and detailed explanation of any options the Company considered to mitigate bill impacts (e.g., tiered rates, low income discount) and the Company's rationale for not proposing any of the identified options.

Response: We have spread the increase over two years to mitigate the impact of the increase. The rates are tiered to meter size. The majority of ENWC customers are fixed income, so while a low income rate would provide some relief for the worst off of the Company's customers, there are likely so many customers that would qualify for such a discount rate that the resulting reallocation of costs to the remaining customers would be unsustainable because the remaining customers are not much better off economically than those that would qualify for the discount. Therefore, the Company has not proposed a low income discount.

Although inclining-block tiered rates were discussed conceptually, the Company made the decision to limit rate structural changes in favor of simplicity and revenue sufficiency, while at the same time reducing rate case related expenses from performing detailed cost of service analyses to support inclining block or class-based rates. The Company did not consider a low-income discount or affordability program.

DPU 1-21: Refer to the prefiled testimony of John E. Alden, Jr., JEA-1, at 8, line 8, and Company Filing, D.P.U. Standard Schedule 4. Please provide:

(a) a breakdown of all plant placed in service from January 1, 2011, through December 31, 2018, including, but not limited to, project descriptions, in-service dates, budget estimates, and actual costs; and

(b) complete and detailed documentation supporting the capital project costs for all plant placed in service since service from January 1, 2011, through December 31, 2018.

Response: (a) Placed in service:

2011	Meters	$ 4,150
2013	Distribution Mains	5,722
2013	Meters	67,673
2015	UV System	191,712
2017	ATV required by DEP	15,386
2017	Equipment	1,396

(b) Have included a detail of "project" expenditures that include Dam Inspections, slope stability study, and other maintenance/capital projects.

DPU 1-23: Refer to the prefiled testimony of John E. Alden, Jr., JEA-1, at 10. Please explain the circumstances surrounding the $850,000 in debt to the Company's stockholder. As part of this response provide all relevant documents supporting this transaction.

Response: Prior to the 2012 Rate Increase Filing, ENWC owed $359,164 to NMH. At that time, NMH converted $184,913 of this debt leaving a debt balance of $174,251. NMH paid $87,875 for the Ultraviolet Light sanitizing system adding that amount to the debt. The balance of the debt is the result of NMH funding accumulated losses since 2012. Backup is attached in DPU-1-23, Att..

DPU 1-27: Refer to the Company Filing, D.P.U. Standard Schedule 4, Depreciation and Amortization Expense. Please provide:

(a) supporting documents, workpapers, and calculations used to determine the Company's proposed rate case expense;

(b) a detailed explanation of the Company's efforts to contain rate case expense;

(c) a copy of all requests for proposals ("RFPs") issued by the Company to retain outside consultants, both legal and non-legal, in connection with the preparation of the Company's rate case;

(d) a copy of each response and bid received by the Company in response to the RFPs;

(e) all bid analyses performed by the Company including an identification of whether each legal and non-legal service consultant provided the lowest bid and, if not, an explanation of why the lowest bid was not chosen;

(f) a detailed explanation of the Company's decision to retain any outside consultants, both legal and non-legal, without the use of a competitive solicitation, if applicable; and

(g) a copy of each letter of engagement for each outside service consultant retained in connection with this proceeding.

Response: (a) The proposed rate case expense of $105,000 constitutes the sum of the service providers' estimates of fees for relevant legal and consulting services ($80,000 legal and $25,000 cost of service/rates consultant), which are based on their experience, assuming a relatively streamlined rate case without an unusual number of discovery requests or of matters in contention and basically a single day of hearings.

(b) In addition to obtaining the best value legal representation and rate consultant as discussed in (f) below, the Company is seeking to contain rate case expense by doing as much work in house (or through affiliate resources) as possible. For example, instead of having our outside rate law firm do the work to ensure compliance with the Department's Order of Notice of Hearing, the Company had the paralegal for the Northfield Mt. Hermon School arrange the publication, service etc. Additionally, we are minimizing the work to be done by the outside rate consultant through the use of the School's Treasurer and accounting team. Additionally, we are carefully monitoring the efforts of the third party service providers and we have made very clear to them the critical financial condition of the Company and the need for them to keep their efforts to a minimal, consistent with providing their services in a complete and professional manner.

(c) See (f) below.

(d) Not applicable.

(e) See (f) below.

(f) The Company proceeded on the basis of the small company exception to the Department's general rule requiring RFPs for rate case outside service as it has only about 300 customers, is not affiliated with other utility companies and has very limited personnel (i.e. two unpaid officers devoting a portion of their time to Company matters and no employees). For a company this size the efforts associated with an RFP process would a burden and not cost efficient. Nevertheless, the Company believes that it has engaged the most qualified and lowest cost providers of legal and rate consultant services on the following basis. It is aware that other than the chosen law firm, Rich May, there has been only one other law firm that regularly practice before the Department that has handled water company rate cases in recent years and that Rich May been chosen in most cases, including those utilizing RFPs. Just as important, Rich May handled the Company's last rate case and has worked with the Company regularly, though not exclusively, since that time. Importantly, such work has included assistance with the Company's strategic efforts. As a result, the Company believes that such law firm can most efficiently and effectively represent the Company. Further, the Company's President is familiar with a reasonable number of law firms and has found significant value and reasonable price in working with Rich May.

With respect to the rate consultant, the Company is also aware that there are a limited number of qualified people to do such work and the Company did contact some of such consultants but found that they were not available. That Mr. Fox of Raftelis had worked with Rich May in the past and been recommended by Rich May as doing a good job and being well appreciated by several other Massachusetts water companies for rate case work, we determined that Mr. Fox of Raftelis would be both an efficient and cost effective choice.

(g) See Attachments DPU 1-27 (a) and (b).