

ROSEBROOK WATER COMPANY, INC.
PUC Regulatory Compliance Report
(March 2013)

A. Introduction

Rosebrook Water Company (“Rosebrook” or “Company”) is a small water utility that serves approximately 400 residential and commercial customers in the Bretton Woods section of the Town of Carroll, New Hampshire. The Company has provided a reliable source of high quality drinking water for its customers for many years in a unique and important location in the State. The Company’s compliance with the Safe Drinking Water Act requirements through the N.H. Department of Environmental Services (“DES”) drinking water program has been and is excellent, and the Company continues to provide quality water service to its customers.

The Company recognizes, however, that it needs to improve its compliance efforts with respect to the N.H. Public Utilities Commission’s (“PUC”) regulatory requirements. Recently, the PUC staff raised concerns about the Company’s noncompliance with the affiliate contract filing requirements under RSA 366, which the Company has addressed by filing its affiliate contracts with the PUC on January 2, 2013 in Docket No. DA 13-001.

The Company is submitting this compliance report to the PUC staff to address the PUC staff’s broader concerns regarding Rosebrook’s compliance with PUC filing requirements. To that end, the Company is putting in place governance procedures, practices, and policies that will give proper focus and follow up with regard to all PUC compliance matters, which are described in this report. This report is intended to demonstrate that Rosebrook has a viable plan for achieving ongoing compliance. It is not intended to require strict adherence to the specific elements of the plan because the Company believes that it ultimately needs the flexibility and freedom to change and shift its resources and policies, as necessary, based on experience and circumstances to ensure its success both at the compliance and operational level.

Rosebrook considered various options for improving its PUC compliance practices, including hiring a new staff person to handle this responsibility, affiliating with another water company to do this, or using existing personnel more effectively for this purpose. After exploration and careful consideration of these alternatives, the Company believes that it is most appropriate to use existing staff to accomplish this goal.

B. Compliance Procedures

Rosebrook’s plan is as follows:

1. Final responsibility and accountability for regulatory compliance will be assigned to Rosebrook’s Drinking Water/Wastewater Manager (the “Manager”). The Manager will act as the primary contact for the PUC and the PUC staff on regulatory matters. The job description for the Manager is provided in Attachment A (identified below) and will include the responsibility of overseeing and ensuring compliance with all PUC requirements.

2. Nancy Oleson currently serves as Rosebrook's Manager. Her resume is attached to this report as Attachment B. As indicated therein, Ms. Oleson has been responsible for DES drinking water program requirements for 4 ½ years. Her efforts on behalf of Rosebrook have resulted in a strong record of compliance with DES, and she is well regarded by that agency in her ability to handle compliance issues. Rosebrook believes that Ms. Oleson's experience with DES's compliance requirements makes her an excellent candidate to oversee and implement Rosebrook's PUC compliance requirements as well.

3. Rosebrook will provide training on PUC regulatory responsibilities to all of its staff as follows:

- a. All employees will be given training on overall PUC compliance requirements for water utilities and on the need to raise questions about possible PUC regulatory ramifications of Company actions and decisions. They will be instructed to seek input from the Company's utility lawyers and accountant on non-routine issues and on compliance questions generally, as needed.
- b. The system operator will be provided more in depth training on PUC requirements for water utilities.
- c. The training will be provided by the Company's utility lawyer(s) or other qualified individual(s).

4. Rosebrook will develop and maintain a compliance checklist to identify regular and anticipated compliance requirements and deadlines.

5. Rosebrook will conduct periodic compliance reviews internally.

- a. During the two years immediately following the Company's implementation of these procedures, it will convene quarterly financial and operational review meetings to identify any compliance deadlines, issues, and action items. Meeting minutes of each such review meeting will be kept so that action items are clearly identified and understood.
- b. Thereafter, the Company will convene financial and operational review meetings on an as needed basis.

Position Description

Position Title: Drinking Water/Wastewater Manager Date: March 6, 2013

Employment Status: Full-time

Department: Water/Wastewater

Primary Functions:

- (1) Operate drinking water treatment plant and two wastewater treatment plants.
- (2) Responsible for regulatory compliance on state Drinking Water Act and NH PUC water utility requirements.

Minimum Requirements:

- High School diploma or equivalent
- Grade II Wastewater Treatment Facility Operator License
- Grade II Water Works Operator, Treatment License
- Grade II Water Works Operator, Distribution License
- Tetanus, Hepatitis A and/or B immunizations
- Good computer skills especially with Microsoft Office (Word and Excel)
- Communication and organization skills

Essential Duties:

- Provide safe, clean and aesthetically pleasing drinking water
- Oversee and take part in all aspects of water and wastewater plant functions
- Complete and submit all required reports to state regulatory officials correctly and timely
- Sampling, testing, recording and reporting all required water and wastewater samples

Other Duties and Responsibilities:

- Work and/or meet with NHDES personnel regarding Sanitary Surveys, Best Management Practices, Dam inspections, Consumer Confidence Reports, and follow up with mailings to all customers if necessary
- Work and/or meet with NH PUC staff on water utility matters
- Communication with all customers
- Ordering of all chemicals, parts and tools and submitting invoices
- Keeping files organized
- Stay updated on new rules, regulations and testing requirements

- Assuring all pumps, motors, mains, shut offs, hydrants, equipment, etc. are in proper working order

Physical Demands:

- Lifting and carrying approximately 50 lbs.
- Able to withstand harsh weather conditions
- Able to walk or snowshoe one mile on flat or 1/4 mile up steep terrain

Working Conditions:

- Involves exposure to body fluids
- Involves handling of and possible exposure to chemicals

I have reviewed and determined that this job description accurately reflects the position.

Employer _____ Date _____ Employee _____ Date _____

Nancy Oleson
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QUALIFICATIONS

- Highly motivated to assure regulatory guidelines are met or exceeded in the water and wastewater industry.
- Communication skills, organization, communication and attention to detail.
- Excellent knowledge of Microsoft Office Word and Excel

WORK EXPERIENCE

January 22, 2007 - Present Rosebrook Water/Resort Waste/Mount Washington Hotel Waste, Bretton Woods, NH. Manager/Operator (September 2008 - present). Responsibilities are overseeing and participating in all aspects of Drinking Water treatment and distribution as well as all aspects of two wastewater lagoon system treatment plants. Drinking Water duties include but are not limited to: Hydrant repair, maintenance and flushing, leak detection and repair, testing and adjustment of pH, alkalinity and chlorine residual, quarterly reading of water meters, monthly and quarterly compliance sampling of required tests and all reporting to NHDES. Wastewater duties include but are not limited to: Gathering information and sampling of monitoring wells, performing lab tests and reporting to NHDES, checking and maintaining 14 pump stations, daily recording of pump hours and flow (for both water and wastewater), maintenance of lagoons and infiltration basins, and responding to all water and wastewater emergencies.

1991 - 2007 White Mountain Hotel and Resort, N. Conway, NH. Front Desk Supervisor (1993 to 2007). Responsibilities included: Hiring, training and supervising a staff of six, solving daily issues with guests and staff, department payroll, commissions, programming of all room rates and packages in Property Management System, keeping all desk staff informed of special packages and rates, manager on duty for both day and evening shifts, involved in day to day running of hotel; especially the front desk. Assistance in dining room functions.

1990 Ekberg and Associates, N. Conway, NH. Secretary/Paralegal.

Worked closely with attorney. Dealt mostly with divorces and Worker's Compensation cases. Responsibilities included: Attending all client-lawyer conferences, going to court and

attending hearings, preparing client's file and pleadings for court, making sure all deadlines were met, fully preparing attorney prior to all conferences and court dates.

1987 - 1990 Nordic Village Condominium Resort, Jackson, NH.

Administrative Assistant (1988-1990). Responsibilities included: Being in charge of three condominium associations, billing and receiving payments from condominium owners, paying association bills, preparing monthly statements and association budgets, worked closely with maintenance, housekeeping and front desk departments, and handling owner comments.

EDUCATION

9/05 - 12/05 Berlin Technical College, Berlin, NH. Water Quality Certificate. Five course certificate program. Wastewater Treatment, Water Treatment, Water and Wastewater Applied Math, Water and Wastewater Laboratory Analysis, Treatment Plant Maintenance. Due to these courses and experience, I currently hold a Grade II license for Water Works Operator-Treatment, Water Works Operator-Distribution, and Wastewater Treatment Facility Operator. These licenses are required per NHDES to work as an operator in these facilities.

1/01-12/01 UNH, Durham, NH. Freshwater Resources-part of Water Resource Management curriculum.

1997-2000 Granite State College, Conway, NH. Associates Degree in Liberal Arts.

1980 Berlin High School, Berlin, NH. General Studies.

INTERESTS/HOBBIES

Hiking, kayaking, mountain biking, snowboarding, back-country skiing, snowshoeing, snowmobiling, stained glass, knitting. Volunteer for VRAP (Volunteer River Assessment Program) through NHDES on the Saco River in Bartlett since 2004. I have been a member of the Bartlett Conservation Commission since 2006. I organized and set up the Adopt-A-Highway program at the White Mountain Hotel and they continue to participate.

REFERENCES AVAILABLE UPON REQUEST