

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

June 7, 2016

RE: Lakes Region Water Company
Docket DW 15-209

We are filing a formal objection on behalf of our water districts to the legal fees charged by Upton & Hatfield for the services of Attorney Justin Richardson and his associates.

Lakes Region Water Company has the following officers:

President – Thomas A. Mason
Treasurer – Barbara G. Mason
Secretary – Susan Mason
Assistant Treasurer – Amy Mason

There is also a Manager and a Board of Directors with members in addition to the officers who also serve on the board.

It is our contention that the officers and/or manager of LRWC should be and should have been preparing timely filings and speaking for the Company during the technical sessions and hearings. Appropriately, this is a management duty. Instead, the Company has retained Attorney Justin Richardson of Upton & Hatfield to substitute for them and do their work for them.

We contend that this is not legal work. We would ask PUC Staff to carefully scrutinize LRWC's submissions to determine if these are truly legal documents merely because they have a law firm letterhead, or whether they are a traditional function of management.

We further assert that officers of the Company have an obligation to represent their positions at PUC sessions, not Attorney Justin Richardson. What is "legal" about his speaking for them ?

By handing off their obligations to Upton & Hatfield, the officers are incurring tens of thousands of dollars in unnecessary and ill-advised expenditures that

LRWC is attempting to pass on to their customers. Where is the incentive for management to perform their duties and eliminate “legal” fees if they can sit back and let someone else do their work for them ? As President Thomas Mason stated, with reference to legal fees, at a prior public technical session,” We’re not paying for that.”

If LRWC chooses to engage someone else to perform their tasks - work that is the traditional duty and obligation of any company - then they should pay for these services from their efficiency of operations and free cash flow.

These costs will be an inappropriate and unacceptable burden to all of our water district’s customers. We also contend it is against good public policy to allow costs such as these into the proposed rate increase process.

We therefore forcefully object to these un-legal fees and implore the PUC to act in the best interests of the water district’s customers by honoring our objection and disallowing these costs.

Yours truly,

Murray Movitz
David Smith
Scott Morrison
Craig Antonides