

BEFORE THE
STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

Lakes Region Water Company, Inc.
Docket No. DW 15-209

ASSENTED TO MOTION FOR WAIVER OF RULE 1901.05 (a)
RATE CASE EXPENSE FILING DEADLINE

NOW COMES Lakes Region Water Co., Inc. ("Company"), by and through
Upton & Hatfield, LLP, and moves to waive rule 1901.05(a):

1. Rule PUC 1901.05 (a) requires that the following information be
submitted "at the time a utility files the materials required for a full rate case":

(1) A detailed description of rate case expenses actually incurred as of the
date of the filing and projected total rate case expenses that include:

- a. The name of the service provider;
- b. The procurement process;
- c. The amount of the expense; and
- d. A description of the charge or service rendered;

(2) A list of all services to be rendered on behalf of the utility in the full
rate case by any vendor; and

(3) The total estimated costs of each service.

2. The Company's testimony and schedules for its full rate case were
prepared in July, 2015 by the Company and filed on August 5, 2015.

3. The information required by rule was not available at the time of filing.

By necessity, the Company's undersigned counsel and its other consultants prepare
invoices for services provided during the prior month. These must be reviewed, verified,

corrected and in some cases adjusted. As a result, it is not possible to know the expenses “actually incurred as of the date of filing.” In addition, both undersigned counsel and Stephen St. Cyr were out of the office for significant periods at the end of July and beginning of August.

4. There appears to be no precedent in other cases before the Commission to address how to implement Rule PUC 1901.05 (a) “at the time a utility files” its full rate case.

5. One approach would be to treat expenses for the preparation of the filing in the current month (*i.e.* not yet billed) as not yet incurred. However, that interpretation would appear contrary to the intent of the rule to obtain the “expenses actually incurred as of the date of the filing”. This is true particularly in this case where the bulk of the services were provided in the month of filing.

6. The solution or best approach to meet the requirements of the rule is unclear. However, in the absence of experience on implementation of the rule, the Company submits herewith the information required by Rule 1901.05 (a) and requests that the Commission waive Rule 1901.05 (a) to the extent that it required this information to be submitted “at the time a utility files the materials required for a full rate case”.

7. Rule 201.05 allows the Company to request a waiver of the filing deadline in Rule 1901.05 (a) in circumstances where “(1) The waiver serves the public interest; and (2) The waiver will not disrupt the orderly and efficient resolution of matters before the commission.”

8. Waiver will serve the public interest and will not disrupt the orderly and efficient resolution of matters before the Commission because the Company has provided

and will provide all of the required information for review. Furthermore, compliance with the rule as technically written would be onerous. An alternative of accepting the enclosed herewith fully accomplished the purposes of the rule within the meaning of Puc 201.05 (b).

9. On September 8, 2015, the Company indicated it intended to file its initial rate case expense report by September 23, 2015. Staff assented. The Office of Consumer Advocate had not yet responded.

Respectfully submitted,

**LAKES REGION WATER
COMPANY, INC.**

By its Counsel,

UPTON & HATFIELD, LLP

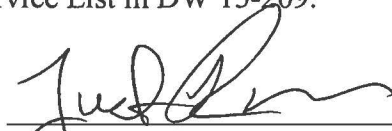


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Dated: September 22, 2015

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was this day forwarded via Electronic Mail to all persons on the Commission's official Service List in DW 15-209.



Justin C. Richardson