

**BEFORE THE NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION**

IMPOA (Indian Mound Property Owners Association) )  
Docket No.: DW15-209 )  
)

**PETITION SEEKING APPROVAL FOR APPEARANCE PRO HAC VICE  
BEFORE THE PUBLIC UTILITY COMMISSION**

IMPOA (Indian Mound Property Owners Association), submits this Petition before the New Hampshire Public Utilities Commission, for appearance by legal counsel, Gary E. Blais, R.I. Bar I.D. 3063, and sets forth the following upon behalf of the organization, collective and rate payers, known as IMPOA (Indian Mound Property Owners Association).

The instant petition seeks approval by the Public Utilities Commission for said Attorney Gary E. Blais, to enter in the above docket as Counsel for IMPOA, as said Legal Counsel. Attorney Blais has been a practicing attorney in good standing before the Bars and Courts of Rhode Island, the United State Federal District Court for the District of Rhode Island, and is a practicing attorney in good standing before the First Circuit Court of Appeals.

Attorney Blais is also a resident of Center Ossipee, NH; a homeowner and rate payer within the IMPOA, and, former Chief Legal Counsel for the Pascoag Fire District, a Rhode Island Public Utility, from 1988 through 1994. In his

position as Chief Legal Counsel, among his many responsibilities, Attorney Blais filed a Petition of “first impression” before the Rhode Island Public Utility Commission, and, against MMWEC (Massachusetts Municipal Wholesale Electric Company), a Petition seeking avoidance of the otherwise known, SEABROOK NUCLEAR POWER Take or Pay Contract, executed by the PFD (Pascoag Fire District) before Mr. Blais’ tenure as Chief Legal Counsel sometime in 1977. That this is a reported case at 636 A.2d 689 (1994), Pascoag Fire District vs. RI Public Utilities Commission.

Attorney Blais has been in practice for approximately thirty-two (32) years, and has regularly been admitted Pro Hac Vice before the Trial Court systems of Massachusetts, and, Connecticut, at Bench decided and Jury Trial Levels, and recently was granted appearance before the Massachusetts Supreme Appellate Court. Further, Mr. Blais has most recently appeared Pro Hac Vice before the New Hampshire Supreme Court Attorney Disciplinary Board in his representation of a New Hampshire Attorney, which matter proved successful for his Attorney/client. Attorney Blais has in years past appeared upon Jury Trials, and non-Jury trial matters within the United States Federal District Court for the District of New Hampshire, the State of New Hampshire Superior and District Courts, upon criminal trial matters, and, he has appeared before other tribunals,

and Body's Politic, within the State of New Hampshire, and, elsewhere over these many years.

In final support of his Petition to be admitted Pro Hoc Vice, Attorney Blais states that he has conducted hundreds, if not thousands of jury, and, non-jury trials, hearings, proceedings and contested matters for over three (3) decades and has never once in any state wherein he has appeared been sanctioned, reprimanded, or, disciplined for any activity, error, or, incident.

WHEREFORE, as based upon all the foregoing Your Petitioners Respectfully pray that this Petition be granted and that Attorney Gary E. Blais, Pro Hac Vice, be approved to represent IMPOA before the NH Public Utilities Commission regarding any and all issues arising in the above docket, and/or, any issue arising between IMPOA, and, Lakes Region Water Company. Petitioners state that time is of the essence, as prior **Order Number #25,809**, within the above Docket, dated September 4, 2015, authorizing a *temporary* rate increase to Lake Region Water Company, is anticipated to become authorized and assessable against the IMPOA rate payers on, or, about September 30, 2015.

Respectfully Submitted,

IMPOA

By Counsel (Pro Hac Vice-Pending)

Blais Law Associates

/s/ Gary E. Blais

Gary E. Blais, Esq. 3063

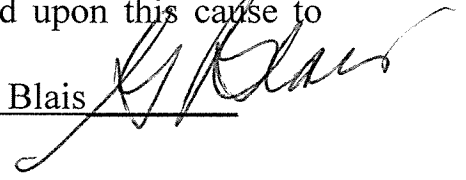
Blais Law Associates  
222 Broadway  
Providence, RI 02903  
(401) 273-9720

Dated: September 30, 2015

CERTIFICATION OF SERVICE

A true copy of the above Petition has been emailed to Upton & Hatfield, LLP., Portsmouth, NH, Attn: Justin Richardson, Esq., this 30th day of September, 2015, to the NH PUC, and other attendant attorneys entered upon this cause to date..

/s/ Gary E. Blais

A handwritten signature in dark ink, appearing to read 'G. Blais', is written over the signature line.