

STATE OF NEW HAMPSHIRE
BEFORE THE PUBLIC UTILITIES COMMISSION

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

MOTION FOR EXTENSION OF TIME

NOW COMES Lakes Region Water Company and moves to extend the time to complete discovery on temporary rates as follows:

1. The approved schedule provides for completion of responses to data requests on temporary rates by October 28, 2015, followed by a technical session on November 4, 2015.

2. The Company has responded to numerous data requests. The following responses remain as noted:

Staff Set 1, 1-35 to 1-40:	Due October 27, 2015.
OCA Set 1:	Due October 27, 2015
POASI, Set 1:	Due October 28, 2015.
Riley & Movitz:	Due October 28, 2015.

3. The Company requests an extension to provide responses by the close of business this Friday October 30, 2015. This should allow time for review before the technical session on November 4, 2015 and to prepare testimony on temporary rates by November 16, 2015.

4. Rule PUC 202.04 provides for an extension of time when “[t]he party making the request has demonstrated that circumstances would cause undue hardship or inconvenience unless the request were granted” and “[t]he extension would not unduly delay the proceeding or adversely affect the rights of any party.”

5. Undue hardship would result if this request were not granted because of the volume and scope of data requests to date, including information related to issues not

directly related to temporary rates. Granting this motion should not adversely affect any other party.

WHEREFORE the Company respectfully requests that the Commission grant this request for an extension pursuant to Rule PUC 202.04.

Respectfully submitted,

LAKES REGION WATER
COMPANY, INC.

By its Counsel,

UPTON& HATFIELD, LLP



Dated: October 27, 2015

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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 for this matter.



Justin C. Richardson