

BEFORE THE NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION

*Lakes Region Water Co., Inc.*

Docket No. DW 15 – 209

Docket No. DW 15 – 422

*Assented to Motion to Continue Procedural Schedule*

NOW COMES Lakes Region Water Co., Inc. (“Lakes Region”), by and through Upton & Hatfield, LLP and moves to continue the procedural schedule in this proceeding as follows:

1. On March 30, 2016, Lakes Region, Staff, the Office of Consumer Advocate and other parties participated in a Technical Session and Settlement Conference (“Settlement Conference”) regarding Lakes Region’s request for a permanent rate increase.
2. During the Settlement Conference, Lakes Region presented an alternative to its proposal to finance acquisition of the Mount Roberts project in an effort to resolve Staff’s concerns related to the inclusion of an allowance for funds used during construction (AFUDC). *See December 2, 2015, Testimony of Jayson Laflamme (Temporary Rates), Pages 9 to 10.*
3. Without waiving any rights, Lakes Region, Staff and the OCA agreed that Lakes Region’s alternative proposal merits further consideration in this proceeding and agreed to recommend that the Commission continue the dates for testimony by Staff, the Office of Consumer Advocate and all other parties, as well as the subsequent dates set forth in the procedural schedule.

4. Lakes Region, Staff and OCA recommend that a technical session be held on May 3, 2016, as currently scheduled, to evaluate Lakes Region's alternative proposal and to establish a schedule for further proceedings.

5. By filing this motion, Lakes Region and all parties reserve all rights with respect to this proceeding and Lakes Region's proposal to acquire the Mount Roberts project as presented in DW 15 – 422. However, Lakes Region agrees that its alternative proposal would be considered as an amendment to its initial proposal for the purposes of suspension of its proposed rate schedules under RSA 378:6. As a result, Lakes Region assents to a reasonable extension of the Commission's Order No. 25,809 suspending Lakes Region's proposed rate schedules in order to allow for further proceedings as contemplated by this motion.

6. Lakes Region, Staff and the Office of Consumer Advocate assent to this motion. The Property Owners Association of Suissevale, Inc. (POASI) and the Indian Mound Property Owners Association assent to this motion. The Hidden Valley Property Owners Association stated an objection to rate increases but did not state a position on the motion. The residents of Judges Road in Thornton, New Hampshire (Waterville Gateway) did not respond.

WHEREFORE Lakes Region respectfully requests that the Commission:

- A. Continue the procedural schedule as requested herein;
- B. Order that a technical session be held on May 3, 2016 at 9 AM for the purpose of reviewing Lakes Region's proposal to acquire the Mount Roberts project and to agree upon a schedule for further proceedings; and
- C. Grant such other relief as justice may require.

Respectfully submitted,

**LAKES REGION WATER  
COMPANY, INC.**

By its Counsel,

**UPTON & HATFIELD, LLP**



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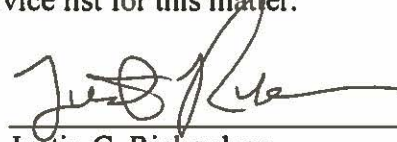
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Dated: April 5, 2016

**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