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BIANCO PROFESSIONAL ASSOCIATION

ATTORNEYS AT LAW

18 CENTRE STREET

CONCORD, NEW HAMPSHIRE 03301-6315

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800-262-8112

May 12, 2010

ORIGINAL

N.H.P.U.C. Case No. DW 09-267

Exhibit No. # 6

Witness

DO NOT REMOVE FROM FILE

VIA ELECTRONIC-MAIL

Marcia A.B. Thunberg  
Staff Attorney  
Public Utilities Commission  
21 S. Fruit Street, Suite 10  
Concord, NH 03301

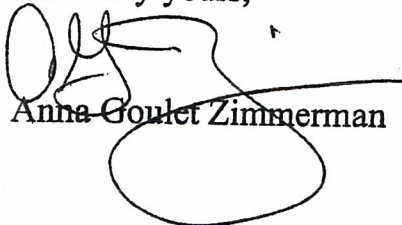
Re: Lamplighter Mobile Home Park  
Investigation into Status as Public Utility

Dear Attorney Thunberg:

I enclose Lamplighter Mobile Home Park, LP's Responses to Staff Data Requests with respect to the above-entitled matter.

Should you have any questions, please do not hesitate to contact my office.

Sincerely yours,

  
Anna Goulet Zimmerman

/jac

Enclosures

cc: Service List

THE STATE OF NEW HAMPSHIRE

PUBLIC UTILITIES COMMISSION

Investigation to Determine if Lamplighter  
Mobile Home Park, LP is a Public Utility

DW-09-267

**LAMPLIGHTER MOBILE HOME PARK, LP'S**  
**RESPONSES TO STAFF DATA REQUESTS**

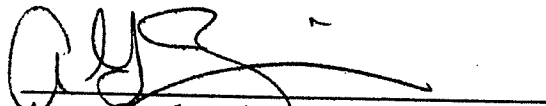
NOW COMES Lamplighter Mobile Home Park, L.P., and files the following Responses to Staff Data Requests. These Responses are submitted subject to, and without waiving, Lamplighter Mobile Home Park, L.P.'s objection to the jurisdiction of the Public Utilities Commission in this matter.

Respectfully submitted,

Lamplighter Mobile Home Park, LP  
By its Attorneys

Bianco Professional Association

Dated: May 12, 2010

  
\_\_\_\_\_  
Anna Goulet Zimmerman, Esquire  
NH Bar No. 18407  
18 Centre Street  
Concord, NH 03301  
603-225-7170

**CERTIFICATE OF SERVICE**

I hereby certify that I have, on this 12<sup>th</sup> day of May, 2010, forwarded electronically a copy of the Respondent's Responses to Staff Data Requests to the following individuals:

Librarian, NHPUC  
Mark Naylor, NHPUC  
Marcia Thunberg, NHPUC  
Amanda Noonan, NHPUC  
Gary Beers, The Hynes Group  
Steven Hynes, The Hynes Group  
Thomas F. Moughan  
Douglas L. Patch, Esquire

  
\_\_\_\_\_  
Anna Goulet Zimmerman, Esquire

**Lamplighter Mobile Home Park, L.P.**

**DW 09-267**

**Data Requests of N.H. Public Utilities Commission Staff**

Date Request Received: 05/06/2010

Date of Response: 05/12/2010

Request No. Staff 1-1

Witness: Denise Rodney,  
Park Manager

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**Request:** Please provide a copy of Lamplighter's "Community Fee Rate Schedule" or similar documents that sets forth all charges Lamplighter charges its tenants.

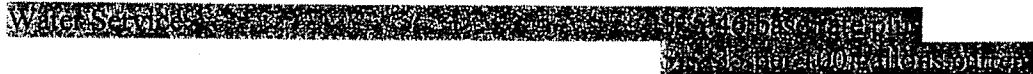
**Response:** A copy of the Community Fee Rate Schedule is attached hereto with the water charges highlighted.

LAMPLIGHTER MOBILE HOME PARK LIMITED PARTNERSHIP

**COMMUNITY FEE RATE SCHEDULE**

Effective April 01, 2010

<b><u>Item:</u></b>	<b><u>Charge:</u></b>
<b><u>Entrance Fee:</u></b> (Site specific work such as upgrading electrical, installing a pad, etc)	For Services Rendered
Monthly Lot Rent:	\$ 385.00
Late Fee (Payable if rent is not paid by the 5 <sup>th</sup> day of the month)	\$ 35.00
NSF (Returned check) Fee	\$ 35.00
Demand for Rent – Notice to Quit Service	\$ 15.00
Maintenance Service Fee (1/2 hr. minimum)	\$ 45.00 / per hour



For Sale Sign Removal Fee	\$ 5.00
Trash Barrel Removal Fee	\$ 5.00
Storage of trailers and recreational vehicles	\$ 10.00 / month
Recreation Center Cleaning Service Surety	\$ 25.00

All payments should be delivered to the Park's on-site representative or mailed to:  
Lamplighter Mobile Home Park  
125 Lamplighter Park  
North Conway, NH 03860

*NOTE: Management reserves the right to change fees upon 60 days notice in accordance with NHRSA Chapter 205.A §4.IV.*

**Lamplighter Mobile Home Park, L.P.**

**DW 09-267**

**Data Requests of N.H. Public Utilities Commission Staff**

Date Request Received: 05/06/2010

Date of Response: 05/12/2010

Request No. Staff 1-2

Witness: Denise Rodney,  
Park Manager

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**Request:** Does the water and sewer systems serving tenants in the Lamplighter mobile home park also serve non-tenants?

**Response:** The water system in question serves only tenants in the park and the park's own infrastructure (manager's office, community clubhouse, etc.). There currently is no sewer system, but any pipes that are put in place to connect to the town sewer system would be used to connect only tenants.

**Lamplighter Mobile Home Park, L.P.**

**DW 09-267**

**Data Requests of N.H. Public Utilities Commission Staff**

Date Request Received: 05/06/2010

Date of Response: 05/12/2010

Request No. Staff 1-3

Witness: Denise Rodney,  
Park Manager

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**Request:** Is it true that water service provided to tenants inside the Lamplighter mobile home park originates outside of the park and is provided by the Conway Village Fire District?

**Response:** Yes, all services are provided by the Conway Village Fire District.

**Lamplighter Mobile Home Park, L.P.**

**DW 09-267**

**Data Requests of N.H. Public Utilities Commission Staff**

Date Request Received: 05/06/2010

Date of Response: 05/12/2010

Request No. Staff 1-4

Witness: Denise Rodney,  
Park Manager

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**Request:** Does Lamplighter mobile home park own the water and sewer system assets in the park? If not, please identify the owner(s).

**Response:** Yes, Lamplighter Mobile Home Park, L.P., the owner of the park, currently owns all pipes and meters within the park.



**Lamplighter Mobile Home Park, L.P.**

**DW 09-267**

**Data Requests of N.H. Public Utilities Commission Staff**

Date Request Received: 05/06/2010

Date of Response: 05/12/2010

Request No. Staff 1-5

Witness: Denise Rodney,  
Park Manager

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**Request:** If the answer to Staff 1-4 is yes, does any of the water and sewer system assets owned by Lamplighter extend outside the boundary of the park?

**Response:** No, Lamplighter has no water or sewer assets which extend outside the park.

**Lamplighter Mobile Home Park, L.P.**

**DW 09-267**

**Data Requests of N.H. Public Utilities Commission Staff**

Date Request Received: 05/06/2010

Date of Response: 05/12/2010

Request No. Staff 1-6

Witness: Denise Rodney,  
Park Manager

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**Request:** Akin to how water service is provided by a separate entity, please state whether any entity other than Lamplighter is involved with the provision of sewer service to Lamplighter tenants. If yes, please explain this entity's involvement.

**Response:** Currently all sewer is handled through septic systems in the park so there is no entity other than Lamplighter involved. If the park proceeds with a connection to the Conway Village Fire District's sewer system, then the Conway Village Fire District would provide all sewer services with the park providing only the pipes which connect the homes to the Conway Village Fire District system.

**Lamplighter Mobile Home Park, L.P.**

**DW 09-267**

**Data Requests of N.H. Public Utilities Commission Staff**

Date Request Received: 05/06/2010

Date of Response: 05/12/2010

Request No. Staff 1-7

Witness: Denise Rodney,  
Park Manager

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**Request:** Please state what rates Conway Village Fire District charges Lamplighter for Water Service.

**Response:** The Conway Village Fire District charges the park a total of \$4,114.00 per quarter in base charges plus an additional charge for water usage at a rate of \$3.50 per 1000 gallons. Copies of the first quarter 2010 bills from the Conway Village Water District are attached.



CONWAY VILLAGE FIRE DISTRICT  
 128 WEST MAIN STREET  
 CONWAY, NH 03818-6139  
 (603) 447-5470

ACCOUNT NUMBER  
 001125

AMOUNT DUE  
 4,584.50



LAMPLIGHTER MHP  
 125 LAMPLIGHTER FARM  
 NORTH CONWAY, NH 03860

PLEASE RETURN THIS PORTION TO ENSURE CREDIT

RETURN THIS PORTION TO THE ISSUING OFFICE

# WATER/SEWER BILL

LOCATION:  
 571 WHITE MOUNTAIN HWY

CONWAY VILLAGE FIRE DISTRICT

FROM	TO	BILLING DATE	DUE DATE
01/06/10	03/30/10	04/02/10	05/12/10
PROPERTY	SEWER	PREMISE	PRESENT
165000	120000	250000	
ITEM DESCRIPTION			ITEM AMOUNT
6WRM	WATER		892.50
	8 INCH METER DEMAND CHARGE		3,692.00
ACCOUNT NUMBER	SERVICE NUMBER	TOTAL DUE	
001125	000052	4,584.50	

PLEASE NOTE REVERSE SIDE FOR ADDITIONAL INFORMATION



CONWAY VILLAGE FIRE DISTRICT  
 128 WEST MAIN STREET  
 CONWAY, NH 03818-6139  
 (603) 447-5470

ACCOUNT NUMBER	AMOUNT DUE
960042	6,127.00

LAMPLIGHTER MANAGER TRUNK ASSOC.  
 125 LAMPLIGHTER PARK  
 NORTH CONWAY, NH 03860

PLEASE RETURN THIS PORTION TO ENSURE CREDIT

# WATER/SEWER BILL

LOCATION: 571 WHITE MNT HWY CONWAY VILLAGE FIRE DISTRICT

FROM	TO	BILLING DATE	DUE DATE
01/06/10	03/30/10	04/02/10	05/12/10
READING		READING	
PREVIOUS	PRESNT	PREVIOUS	PRESNT
960000	*****	1630000	
SERVICE		ITEM AMOUNT	
61000 WATER		5,705.00	
1 WATER - 2" METER DEMAND		422.00	
<b>LAMPLIGHTER MANAGER-OHR OK TO PAY</b>			
ACCOUNT NUMBER		SERVICE NUMBER	TOTAL DUE
960042		000045	6,127.00

PLEASE NOTE REVERSE SIDE FOR ADDITIONAL INFORMATION

57, 10/00 1 03860 0 00 00 00 00 00

**Lamplighter Mobile Home Park, L.P.**

**DW 09-267**

**Data Requests of N.H. Public Utilities Commission Staff**

Date Request Received: 05/06/2010

Date of Response: 05/12/2010

Request No. Staff 1-8

Witness: Denise Rodney,  
Park Manager

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**Request:** If another entity provides sewer service to Lamplighter, please state what rates it charges Lamplighter for sewer service and please explain what type of service it provides.

**Response:** No other entity provides sewer services at this time.

**Lamplighter Mobile Home Park, L.P.**

**DW 09-267**

**Data Requests of N.H. Public Utilities Commission Staff**

Date Request Received: 05/06/2010

Date of Response: 05/12/2010

Request No. Staff 1-9

Witness: Denise Rodney,  
Park Manager

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**Request:** Does Lamplighter charge a specific sewer rate to tenants and if so, how is that charge billed to tenants and how is that rate set?

**Response:** As all sewer services are currently on septic systems there is not a specific sewer charge to tenants.

**Lamplighter Mobile Home Park, L.P.**

**DW 09-267**

**Data Requests of N.H. Public Utilities Commission Staff**

Date Request Received: 05/06/2010

Date of Response: 05/12/2010

Request No. Staff 1-10

Witness: Denise Rodney,  
Park Manager

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**Request:** With respect to the base and volumetric water rates charged to tenants, please explain how these rates are set.

**Response:**

The base and volumetric water charges are a direct pass through of the charges billed to the park by the Conway Village Fire District. The base charge of \$4,114.00 is passed on to the residents at a rate of \$5.46 per month to each home. This figure was reached by dividing the base fee into a monthly charge (since the base fee is billed quarterly) and then dividing this by 251. The 251 represents the 247 total lots (even though only about 220 are occupied), plus the 4 connections used by the park. The residents are then charged monthly for their individual water usage at the same rate the park is billed (\$.35 per 100 gallons). This monthly charge is based off of meters at each individual home. Attached is a copy of a recent sample bill demonstrating this billing method. This bill is provided to the tenants each month along with their monthly lot rental bill.

The charges for water were formerly included within the fixed monthly lot rental. This process was changed in an effort to be fair to all tenants (tenants who use less water now have a lower bill) and also has the beneficial result of promoting individual conservation. At the time of this conversion, fall 2007, the fixed monthly rental charges were reduced by \$10.00 per month to compensate for this change in the billing structure.



F Lamplighter Mobile Home  
 R 125 Lamplighter Park  
 O North Conway, NH 03860  
 M

303-BUC [REDACTED]

DUE DATE: February 01, 2010

T [REDACTED]  
 O 72 BUCKINGHAM DRIVE  
 CONWAY, NH 03818

Meter Usage						
	Date	Reading	Date	Reading	Usage	
WAT WATER	12/18/2009	1,319	1/21/2010	1,364	45	

Utility Charges						
				Amt.		
WAT	base charge			0.00	4.42	4.42
WAT	water usage(1 unit=100gal)	0.280000		12.60	0.00	12.60
<b>Total:</b>						<b>17.02</b>

Total:		17.02
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Please send this portion with your payment.

DUE DATE: February 01, 2010

Resident Id: 303-BUC-0 [REDACTED]  
 Resident Name: [REDACTED]

R  
 E T Lamplighter Mobile Home  
 M O 125 Lamplighter Park  
 I North Conway, NH 03860  
 T (803) 447-5720

Utility Charges:	17.02
Utility Tax:	0.00
Other Charges:	0.00
<b>Total:</b>	<b>17.02</b>

CHECKS PAYABLE TO: LAMPLIGHTER MOBILE HOME PARK      1/23/2010

**Lamplighter Mobile Home Park, L.P.**

**DW 09-267**

**Data Requests of N.H. Public Utilities Commission Staff**

Date Request Received: 05/06/2010

Date of Response: 05/11/2010

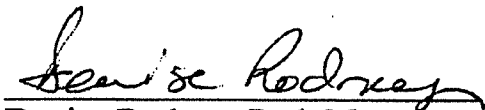
Request No. Staff 1-11

Witness: Denise Rodney,  
Park Manager

**Request:** Does Lamplighter provide any treatment to the water that is provided to tenants?

**Response:** Lamplighter does not provide any treatment to the water that is provided to the tenants.

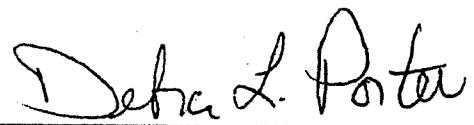
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Denise Rodney, Park Manager

5/11/2010  
Date

THE STATE OF NEW HAMPSHIRE  
COUNTY OF Carroll

On this 11<sup>th</sup> day of May, 2010, personally appeared before me, Denise Rodney, and made oath that the foregoing responses are true to the best of her knowledge and belief.

  
Justice of the Peace/Notary Public  
My Commission Expires DEBRA L. PORTER, Notary Public  
My Commission Expires February 18, 2014