

BEFORE THE NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

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

LAKES REGION WATER COMPANY
Permanent and Temporary Rate Increase Proceeding

PETITION TO INTERVENE UPON BEHALF OF INDIAN MOUND
PROPERTY OWNERS ASSOCIATION (IMPOA)

IMPOA (Indian Mound Property Owners Association), respectfully submits this Petition before the New Hampshire Public Utilities Commission, for leave to intervene as a full party in the above-captioned proceedings pursuant to Administrative Rule PUC 203:17, and, RSA 541-A:32. In support hereof, your Petitioner represents the following:

1. That on September 4, 2015, the Commission issues Order Number 25,809 in the above entitled cause, suspending proposed tariffs submitted by Lakes Region Water Company, and, scheduling a prehearing conference, in order to review a proposed p[ermanent rate increase and request temporary rates filed on August 5, 2015, The Commission noted Lakes Region (LRWC), is seeking a permanent increase in its annual gross operating revenues of 38.18%. The Order also noted that some of the issues raised by this filing include RSA 378:7, and, the justness and

reasonableness of LRWC's proposals including proposed temporary and permanent rate charges; proposed operating expenses, pro forma adjustments, and rate of return; the proposed rate base and its prudence and used and usefulness; and whether any proposed financing is consistent with the public good. In the Order the Commission set a pre-hearing conference for September 30, 2015 @ 1:30 p.m. and established a deadline of September 25, 2015 for the submission of petitions to intervene.

2. The IMPOA (Indian Mound Property Owner's Association), is a New Hampshire Domestic Non-Profit Corporation filed on April 16, 1971. The company's filing status is listed as Good Standing and its file number is 63524. The company's principal address is P.O. Box 596, Center Ossipee, NH 03814. IMPOA consists of approximately One Hundred and Sixteen (116) voting members, all of which are land owners protected under the corporation, and all are rate payers to Lakes Region Water Company.
3. IMPOA is a relatively new non-metered customer of Lakes Region and it now depends on Lakes Region for the water served to its members. That in discussions prior to the transfer to Lakes Region of IMPOA's own pump house, and appurtenant facilities to run the water service, Lakes

Region had discussed, that it would supply the association members with meters so that direct billing based upon usage by customers would be achieved. Since transfer to Lakes Region the association members have no meters and billing is in the form of a “one size fits all”, quarterly billing invoice to all individual association members.

4. Because the docket will address issues related to the revenues and expenses of Lakes Region and the allocation of revenue between metered and unmetered customers, the outcome of this docket could have an impact upon what IMPOA pays to Lakes Region under the terms of the water supply agreement between Lakes Region and IMPOA. The interest of IMPOA’s members and IMPOA’s interest as a wholesale customer of Lakes Region, and therefore IMPOA’s rights, duties, privileges or substantial interests may be affected by this proceeding. IMPOA believes it must intervene in this proceeding to protect those rights. Granting IMPOA’s petition for intervention would be in the interest of justice and would not impair the orderly and prompt conduct of the proceedings.


WHEREFORE, IMPOA respectfully requests that the Commission grant it full intervenor status in the proceeding or grant such other relief as the Commission deem meet and just.

Respectfully Submitted,

IMPOA

By Counsel (Pro Hac Vice-Pending)

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Dated: September 30, 2015

CERTIFICATION OF SERVICE

A true copy of the above Petition to Intervene has been emailed to Upton & Hatfield, LLP., Portsmouth, NH, Attn: Justin Richardson, Esq., this 30th day of September, 2015, by electronic filing before the NH PUC, and to Douglas Patch, Esq., Orr & Reno, P.A. 45 South Main Street, Concord, NH 03302-3550.

/s/ Gary E. Blais 