

**STATE OF NEW HAMPSHIRE**  
**BEFORE THE**  
**NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION**

**Docket No. DW 15-422**

**Lakes Region Water Company, Inc.**

**Petition for Approval of Long-term Financing and  
Transfer of Land owned by an Affiliate and Consolidation with DW 15-209**

PETITION TO INTERVENE ON BEHALF OF THE PROPERTY OWNERS  
ASSOCIATION AT SUISSEVALE, INC.

The Property Owners Association at Suissevale, Inc. ("POASI") respectfully petitions the New Hampshire Public Utilities Commission ("Commission") for leave to intervene as a full party in the above-captioned proceeding pursuant to Admin.Rule Puc 203.17 and RSA 541-A:32. In support of this petition, POASI represents that:

1. On November 2, 2015 the Commission issued an Order of Notice in the above-captioned docket, setting a date for the filing of petitions to intervene (December 4, 2015), and scheduling a technical session for December 16, 2015, at the same time as a technical session scheduled for DW 15-209, an open investigation of rate increases proposed by Lakes Region Water Company, Inc. ("Lakes Region"). As the Commission noted in the Order of Notice, Lakes Region is requesting approval of long-term financing and the transfer of land owned by an affiliate related to the Mount Roberts property. As the Commission further noted, the Mount Roberts property includes wells and equipment located on the property that are used by LRWC to serve the Paradise Shores portion of the system.

2. POASI is an association of homeowners located in Moultonborough, New Hampshire, which owns, maintains and operates its own water distribution system for the

sole purpose of providing water to its members. POASI has never been regulated as a public utility and the Commission has granted POASI an exemption from regulation as a public utility pursuant to RSA 362:4. Order No. 24,698 issued on November 8, 2006 in DW 06-106, 91 NH PUC 552.

3. POASI is a long-standing, wholesale, metered customer of Lakes Region that depends on Lakes Region for the water needed to serve its members. Lakes Region has supplied water to POASI as a wholesale customer since 1994 through one meter point located on the edge of its franchise area in its Paradise Shores system adjacent to POASI. POASI is therefore served by the wells and equipment located on Mount Roberts referenced above.

4. In Order No. 24,693, issued on October 31, 2006 in docket DW 06-133, 91 NH PUC 523, the Commission approved a 30 year special contract between Lakes Region and POASI pursuant to which Lakes Region supplies water to POASI. That contract contains a rate per 100 cubic feet of water and a fixed charge, both of which may be adjusted depending on the annual report which Lakes Region files with the Commission and a worksheet in which Lakes Region calculates actual expenses incurred during the prior year.

5. Because this docket will address issues related to the financing and transfer of land that will have an impact on revenues and expenses of Lakes Region and the allocation of revenue between metered and unmetered customers, the outcome of this docket will also have an impact on what POASI pays to Lakes Region under the terms of the water supply agreement between Lakes Region and POASI. The interests of POASI's members and POASI's interest as a wholesale customer of Lakes Region, and

thus POASI's rights, duties, privileges or substantial interests, may be affected by this proceeding. POASI believes it must intervene in this proceeding to protect these rights. Granting POASI's petition for intervention would be in the interest of justice and would not impair the orderly and prompt conduct of the proceedings.

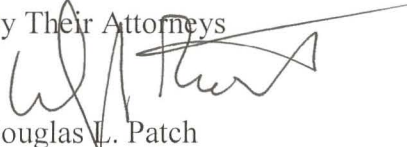
6. The Commission granted POASI's request to intervene in Lakes Region's currently pending rate case, DW 15-209, and in its last rate case, DW 10-141.

WHEREFORE, POASI respectfully requests that the Commission grant it full intervenor status in the proceeding or grant such other relief as the Commission deems just and equitable.

Respectfully submitted,

Property Owners Association at Suissevale, Inc.

By Their Attorneys



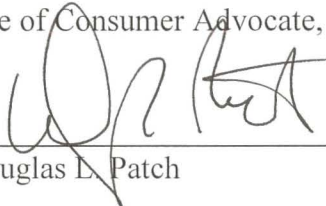
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Dated: December 2, 2015

Certificate of Service

I hereby certify that a copy of the foregoing Petition has on this 2<sup>nd</sup> day of December, 2015 been sent by electronic mail to the service list in DW 15-422 and DW 15-209, which includes Lakes Region and the Office of Consumer Advocate, as required by the Order of Notice in this docket.

By:



Douglas L. Patch