THE STATE OF NEW HAMPSHIRE

PUBLIC UTILITIES COMMISSION

DW 13-041

Petition for Emergency Rates Pursuant to RSA 378:9

ASSENTED-TO JOINT REQUEST FOR EXTENSION OF TIME

Staff and the Office of the Consumer Advocate (OCA) hereby request an extension of time to July 15, 2013 to file its objection to Lakes Region Water Company, Inc.'s (Lakes Region) motion for rehearing. Lakes Region filed its motion at the close of business on Friday, July 5, 2013, pursuant to N.H. Code of Admin. Rule Puc 202.03, Computation of Time. Pursuant to Puc 203.07(f), objections are due within 5 calendar days, which, counting the weekend, means the objections are due today, July 10th.

In support of this Motion, Staff and the OCA state as follows:

- 1. Lakes Region's nineteen page motion was filed late in the day on the Friday of a holiday weekend. Given the intervening weekend, Staff and the OCA effectively have only three days to review and analyze the motion and to draft a response to the motion. This is too little time for the numerous issues raised in the motion. In comparison, Lakes Region has had thirty days over which to craft its arguments and verify its citations to the record.
- 3. Puc 202.04(c) provides that the Commission shall grant an extension when:
 - (1) The party making the request has demonstrated that circumstances would cause undue hardship or inconvenience unless the request were granted; and
 - (2) The extension would not unduly delay the proceeding or adversely affect the rights of any party.

5. It would cause undue hardship or inconvenience for Staff and the OCA to file their objections by close of business today. It will not unduly delay the proceeding to allow Staff and the OCA a few additional days with which to prepare objections to the motion.

6. Lakes Region consents to Staff and the OCA's request for an extension of time to file their objections. Thus, the requested extension will not adversely affect the rights of any party to the proceeding.

WHEREFORE, Staff and the OCA respectfully request that the Commission:

A. Grant this request for an extension of time until July 15, 2013 to file an objection to Lakes Region's motion; and

B. Grant such other and further relief as may be just and equitable.

Respectfully submitted,

Marcia A. Brown, Staff Attorney

OFFICE OF THE CONSUMER ADVOCATE

Rorie E. P. Hollenberg, Attorney

CERTIFICATE OF SERVICE

I hereby certify that a copy of this motion has been forwarded to all parties on the service list in this docket.

Dated: July 10, 2013

Marcia A. Brown, Staff Attorney