

The State of New Hampshire
Public Utilities Commission
DW 16-123

Re: Aquarion Water Company of New Hampshire, Inc.

TOWN OF HAMPTON MOTION TO DELAY COMMISSION ACTION
ON PETITION FOR MONTHLY BILLING

NOW COMES the Town of Hampton in the above entitled matter and moves for a delay in the Commission's taking action upon the petition of the billing in the above entitled matter and in support of said Motion, the Town says as follows:

1. This Petition for Monthly billing was only recently filed with the Commission on January 25, 2016.
2. The only action taken to date by the Commission has been the issuance on January 27, 2016 of the Executive Director's acknowledgement letter.
3. The Petitioner Aquarion Water Company of New Hampshire, Inc., is requesting in its Petition that it be allowed to implement monthly billing with a proposed May 1, 2016 effective date and asks that the Commission enable that to occur by granting its Petition on a "Nisi" basis by March 1, 2016.
4. While the Operations Manager for Aquarion Water Company indicated to the Hampton Board of Selectmen at one of its regular meetings on November 2, 2015, that the Company intended to file a petition with the Commission in the first quarter of 2016 to allow monthly billing, he provided no details as to the mechanics or rate effects of this billing.
5. The details of the proposal as revealed in the Petition itself represent a dramatic change in the manner by which Hampton customers have historically be billed by this public utility and its predecessor.
6. Paragraphs 7 and 8 of the Petition reveal in addition that the change to monthly billing will impact the Company's working capital and will have an impact on the Company's next rate case.

7. The Town of Hampton, whose population contains about three quarters of the residential customers who are served by Aquarion, needs a better understanding of this change and its impacts and to develop positions based on a more thorough explanation by Company officials of these impacts; the Board of Selectmen also would like to afford its residents an opportunity to voice their opinions and concerns as to the same.
8. For these purposes, the Hampton Board of Selectmen are scheduling a Public Hearing on this Petition at the next scheduled Selectmen's Meeting to occur on Monday, February 22, 2016 and will invite Aquarion officials to attend and explain same.
9. Until such time as this Public Hearing occurs, the Board of Selectmen are not in a position to articulate what positions the Town would take on the Petition for Monthly Billing.
10. Because of the wide-spread impact of customers going to monthly billing, the Commission should not act upon the Petition for Monthly Billing on a "Nisi" basis as requested in the Petition, and should instead afford the opportunity for all affected communities to provide detailed comments to the Commission before any action is taken and perhaps a hearing if requested.
11. While there may have been some prior indications that the North Hampton Water Commission would be in favor of the Company's billing metered customers on a monthly basis, no such indications of support have been given by the Town of Hampton or the Rye Water District which are the other communities that are served by Aquarion water.

Wherefore, the Town of Hampton requests that the Commission:

- a. Not act upon the Petition for Monthly Billing on a "Nisi" basis or approve the Petition for monthly billing on an expedited basis as requested by Aquarion;
- b. Delay action on the Petition for Monthly Billing until such time as all the communities involved have had an opportunity to provide informed comments and statements of position to the Commission along with conducting a hearing, if requested ; and,
- c. Grant such other and further relief as may be just.

Respectfully submitted
Town of Hampton

By its Town Attorney


Dated: February 11, 2016



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Certificate of Service

I hereby certify that I have this 11th day of February, 2016 e-mailed the foregoing Petition to Intervene to the Petitioner's Counsel, Marcia A. Brown, Esq in this matter and to the Office of the Consumer Advocate and its server list.



Mark S. Gearreald, Esq.