

President of Board of Directors Rosebrook Association
c/o Lawrence DeVito.
250 South St, Tewksbury, MA 01876

State of New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301

RE: DW 17-165 Abenaki Water Company-Rosebrook

As the Rosebrook Association, we represent approximately 24 homeowners or 6% of the Residential Homeowners that are serviced by Abenaki Water Company. We are responding to the Petition for Change in Rates Order No. 26,097 dated January 5, 2018.

We have read the petition and under section page 3, paragraph 3 that states our rights to intervene in the **proceedings on or before January 18, 2018; here are our initial concerns:**

- Abenaki is requesting a 37.85% permanent adjustment and a step adjustment of 6.08%. As Abenaki purchased the Assets in September 2016, we find that the increase in rates at this magnitude, 16 months later, to be borderline extortion.
- As noted in the petition, page 2 paragraph 2, Abenaki proposes an increase in rates due to "due diligence and acquisition premium costs associated with the purchase of Rosebrook Water Company". Our position **is these costs are Abenaki's business decision and they should not seek to recover these cost through homeowners.**
- As noted on page 1, paragraph 3, "proposes a step adjustment of an additional \$22,645 or 6.08 percent." and goes on to say "is based on capital improvements that will be used and useful as of the end of 2017." We have not received any detail for what this is for and are unaware of any capital improvements made in 2017.
- As noted on page 2, paragraph 1, "Abenaki-Rosebrook states that the requested permanent rate increase **is necessary due to the ... investment in radio read meters.**" **Again, this was a business decision made by Abenaki Rosebrook** to improve their cash flow from quarterly to monthly billings. By doing this, it allows them to receive payment of invoices more frequently. Again, we take the position that Homeowners should not pay for this as they were aware of the existing meters and billing systems at the time of the Acquisition. It was not necessary to change the meters as they were functioning properly. In addition, it has been brought to our attention, that during the meter changeover, there were homeowners who experienced issues in this transition including extensive property damage.
- We have issues with the lack of timeliness and transparency of the Petition:
 - The Petition is dated January 5, 2018.
 - The mailing was postmarked January 11, 2018.
 - Due to the MLK holiday, the homeowners began receiving them on January 16, 2018.
 - Expectation is that we are to respond by January 18, 2018.
 - There was no cover letter to the Petition nor were there any previous communications about the desire to propose the increase in rate.

We appreciate your consideration.


Respectfully

President of Board of Directors Rosebrook Association
Lawrence DeVito.

Cc: Abenaki Water Company Office of Consumer Advocate