

THE STATE OF NEW HAMPSHIRE
before the
PUBLIC UTILITIES COMMISSION

RESIDENTS OF COLONIAL DRIVE, MOULTONBOROUGH

Receivership of Community Church Sewer System

Docket No. DW 22-082

MOTION TO INTERVENE OF THE LAMPREY SUBURBAN SEPTIC, INC.

Lamprey Suburban Septic, Inc. ("**Lamprey Septic**") hereby requests to intervene in this docket pursuant to RSA 541-A: 32 and Puc §§ 203.02 and 203.17. In support of its Motion, Lamprey Septic says the following:

1. On December 9, 2022, the Public Utilities Commission ("**PUC**") issued a Procedural Order re: Hearing on Preliminary Issues in which the Complaint "requested that the Commission open a receivership proceeding pursuant to RSA 374:47-a, enforce the provision of safe and adequate sewer utility service under RSA 374:1, and grant any other relief that may be just and reasonable". Lamprey Septic was the Septic Company referenced in the Complaint previously servicing the subject sewer system prior to ceasing all service due to non-payment.
2. Additionally, since Lamprey Septic was the previous Septic Company servicing the sewer system in question, Lamprey Septic has specific interests in participating in this process in order to recover substantial outstanding balances owed for such services.
3. Lamprey Septic likewise has an interest in this docket and Lamprey Septic's interests will be affected by the PUC's decisions in the docket. Therefore, Lamprey Septic meets the statutory requirements for intervention and should be made a full intervener in this proceeding at or prior to the Hearing currently set for April 5, 2023.

4. The undersigned has sought assent to this Motion from Counsel of Record as listed in the Docket Related Service List and as of the time of this filing, the undersigned has received assent from Marcia Brown on behalf of the Residents of Colonial Drove, Moultonborough, and Assistant General Brooks on behalf of the New Hampshire Department of Environmental Services. Additionally, Matthew C. Young on behalf of the Department of Energy (DOE) indicated DOE does not oppose the intervention of Lamprey Septic. The undersigned has not heard back from other Counsel.

WHEREFORE, the Lamprey Suburban Septic, Inc. requests that Lamprey Septic be made a full intervener in this docket.

Respectfully submitted,

Lamprey Suburban Septic, Inc.
By and through its City Attorney

3/30/23
Date

By:

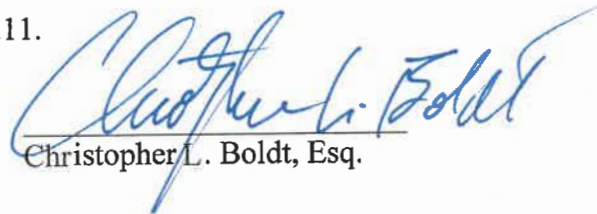


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CERTIFICATE OF SERVICE

I hereby certify that, on the date written below, I caused the attached Motion to Intervene to be served pursuant to N.H. Code Admin. Rule Puc 203.11.

3/30/23
Date



Christopher L. Boldt, Esq.