

**BEFORE THE NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION**

PETITION PURSUANT TO RSA 362:4 :  
AND RSA 374:22 TO EXTEND : DOCKET NO. DW 23-016  
WATER AND SEWER SERVICES AREAS :  
FILED BY CITY OF LACONIA :

**MOUNTAIN LAKE VILLAGE, LLC  
PETITION TO INTERVENE**

Pursuant to New Hampshire Revised Statutes Annotated 541-A:32 and New Hampshire Administrative Rules Puc 203.17, Mountain Lake Village, LLC (Mountain Lake) hereby petitions the New Hampshire Public Utilities Commission (“Commission”) to intervene in the above-captioned proceeding. In support of the petition, Mountain Lake states the following:

**INTRODUCTION**

1. On March 15, 2023 the Commission opened “this proceeding to examine Petition to Extend Water and Sewer Service Areas in which was in response to said Petition filed February 17, 2023 by the City of Laconia.
2. Interested parties have an opportunity to file petitions to intervene in the proceeding. Mountain Lake is owner of all 18 lots in Belmont for which water and sewer service is proposed to be furnished.
3. Mountain Lake now hereby petitions to intervene in the proceeding.

**STANDARD**

4. “The [C]ommission shall grant one or more petitions to intervene in accordance with the standards of RSA 541-A:32.”
5. RSA 541-A:32 requires that any petition to intervene be filed “at least 3 days before the hearing.”
6. The Commission must grant a petition to intervene if: (a) the petition describes how the petitioner is substantially and specifically affected by a proceeding; and (b) the

intervention would be in the interests of justice and would not impair the orderly conduct of the proceeding.

7. The Commission also has the discretion to grant a petition to intervene “at any time, upon determining that such intervention would be in the interests of justice and would not impair the orderly conduct of the proceedings.”

### **INTERVENTION REQUEST**

8. This proceeding will review questions related to: Extension of Water and Sewer Services to 18 Lots in Belmont owned by Mountain Lake which 18 lots are a portion of a multi-jurisdictional subdivision of 51 lots located along the City/Town line of Laconia and Belmont, for which Mountain Lake has obtained subdivision Approval from Laconia and Belmont. There are 18 lots in Belmont and 33 in Laconia. An Intermunicipal Agreement has been negotiated and approved by all parties that will provide details of water and sewer changes to Belmont lot owners. The Belmont cluster subdivision ordinance requires water and sewer services. Laconia has the capacity and ability to provide water and sewer services to the 18 Belmont lots.

9. The extension of water and sewer service area has a direct and substantial effect on Mountain Lake.

10. Mountain Lake’s participation in this proceeding would be in the interests of justice.

11. Mountain Lake’s participation will not impair the orderly conduct of the proceeding. Hearing is scheduled in this matter April 6, 2023 at 9:00 am. Mountain Lake’s request, therefore, satisfies the timing requirements of RSA 541-A:32.

12. Mountain Lake can provide valuable insights to assist the Commission in its evaluation of the Petition without disrupting the procedural schedule or orderly conduct of the proceeding.

### **CONCLUSION**

For all the forgoing reasons, the Commission should grant Mountain Lake’s petition to intervene in this proceeding.

Dated: March 27, 2023

Respectfully submitted,  
Mountain Lake Village, LLC

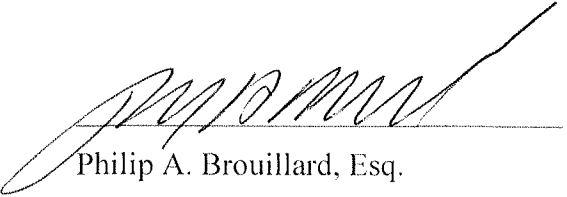
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Its Attorneys

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of this petition to Intervene has this day been sent via electronic mail or first-class mail to all persons on the service list attached.



Philip A. Brouillard, Esq.

Dated: March 27, 2023