

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

RE: PITTSFIELD AQUEDUCT COMPANY, INC.

DOCKET NO. DW 08-052

**PITTSFIELD AQUEDUCT COMPANY, INC.'S MOTION FOR STAY OF
PROCEDURAL SCHEDULE UNTIL MARCH 13, 2009**

Pittsfield Aqueduct Company, Inc. ("PAC" or the "Company") hereby moves the New Hampshire Public Utilities Commission to stay temporarily the procedural schedule in this docket until March 13, 2009 in order to allow the Company to revise its request for permanent rate relief. In support of its motion, PAC states as follows:

1. On May 2, 2008, PAC filed a request for a permanent rate increase and a petition for temporary rates. PAC serves customers in the Town of Pittsfield, as well as customers in three systems in the North Country, Sunrise Estates, Locke Lake, and Birch Hill (the "North Country Systems"). In its request for permanent rate relief, PAC sought an increase of 44.01% for its Pittsfield customers and a 311% increase for customers served by its North Country Systems. On December 31, 2008, the Commission approved temporary rates for PAC, granting a 40% increase in rates for Pittsfield customers, and an increase for North Country customers that results in average annual residential bills that are 25% over the allowed Pittsfield rates. Order 24,929 at 14.

2. On January 9, 2009, the parties to this docket met for a technical session at which the Company presented a proposal to modify its request for permanent rates as to its North Country systems. In broad terms, the Company will be proposing to transfer the

North Country systems and the franchise right to serve those customers to its sister utility, Pennichuck East Utility, Inc., and will seek recovery of its capital improvements to the North Country systems through system-specific charges for each of the North Country systems. The effect of the proposal would be to reduce substantially the Company's request for permanent rate relief. The Company anticipates filing a petition with the Commission to effectuate that transfer as well as a modification to its rate request in this docket.

3. Most of the parties that attended the technical session¹ were receptive to the proposal and to working with the Company to resolve the issues in this docket. By staying the procedural schedule, the Company will be able to submit a modified request for permanent rates with the Commission both for its Pittsfield and North Country systems, at which point the docket could proceed.

4. The Company anticipates filing its proposed modification with the Commission on or around March 13, 2009. Temporary rates, as approved by Order 24,929, would remain in effect for both the Pittsfield and North Country Systems until permanent rates are approved by the Commission. Permanent rates would be fully reconcilable with temporary rates, as provided for in Order 24,929.

5. The Company proposes to work with the parties to develop a new procedural schedule for the completion of this docket, which it would then propose to the Commission. The Company would file the proposed procedural schedule in advance of March 13, 2009, when the proposed stay would expire.

¹ All of the parties but Birch Hill were in attendance at the technical session.

6. Therefore, the Company requests that the Commission temporarily stay the current procedural schedule until March 13, 2009 to allow the Company sufficient time to modify its request for permanent rates.

7. Staff, Locke Lake Colony Association, Birch Hill Water District, and Sunrise Lake Estates Association assent to the relief sought in this motion. The Town of Pittsfield and the Office of Consumer Advocate have not stated their position as of the time of filing of this Motion.

WHEREFORE, PAC respectfully requests that the Commission:

- A. Grant this Motion for Stay of Procedural Schedule until March 13, 2009;
- and
- B. Such other relief as is just and equitable.

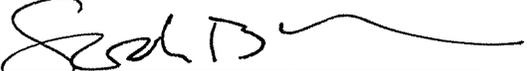
Respectfully submitted,

Pittsfield Aqueduct Company, Inc.

By Its Attorneys

MCLANE, GRAF, RAULERSON &
MIDDLETON, P.A.

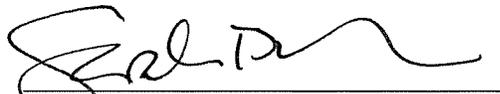
Dated: January 14, 2009

By: 

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Certificate of Service

I hereby certify that a copy of this Motion has been forwarded to the parties by electronic mail on January 14, 2009.


Sarah B. Knowlton