

STATE OF NEW HAMPSHIRE

BEFORE THE PUBLIC UTILITIES COMMISSION

Lakes Region Water Company, Inc.

Docket No. DW 16 – 619

ASSENTED TO MOTION FOR EXTENSION OF TIME

NOW COMES Lakes Region Water Co., Inc (“Lakes Region”) and moves to extend the time to respond to Staff and OCA discovery requests as follows:

1. On July 22, 2016, Lakes Region and Dockham Shores Estates Water Co., Inc (“Dockham Shores”) received data requests from Staff and OCA. Responses are due August 1, 2016. Responses to second round data requests will be due August 25, 2016.

2. Staff data requests and OCA’s data request include questions related to the title to the water utility property to be acquired, including amendments to the declaration, covenants and easements as well as the sale of lots within the Dockham Shores subdivision.¹

3. Lakes Region and Dockham Shores anticipated resolving all title questions prior to the closing for the purchase and financing. While counsel for Lakes Region and Dockham Shores have reviewed title and identified the assets to be acquired, the Staff and OCA data requests appears to require a more thorough title examination such as would be performed by a title company. Lakes Region does not object to providing this information but does not believe that a title report will be available by August 1, 2016.

¹ For example, Staff Data Request 1 – 10 (a) asks “how Colin and Mary Robertson transferred their interests as “Developers” ... to Dockham Shore Estates Association and/or Dockham Shores Estates Water Company, Inc.”. Staff Data Request 1 – 10 (b) asks for “all documents that evidence any transfer referenced in a).”

4. As a result, Lakes Region and Dockham Shores request an extension in order to respond to Staff Requests 1 – 7 through 1 – 11 and to OCA’s data request as soon as possible and prior to the August 25, 2016 deadline for second round responses.

5. To the extent that additional discovery may be required as a result, Lakes Region and Dockham Shores will provide additional information and agree to adjust the schedule, as needed.

6. In addition, Lakes Region learned yesterday that both counsel for Dockham Shores are unavailable due to unforeseen circumstances. Lakes Region has obtained the assent of Staff and OCA as a result.

WHEREFORE the Lakes Region respectfully requests that the Commission grant this request for an extension pursuant to Rule PUC 202.04 as stated herein.

Respectfully submitted,

LAKES REGION WATER
COMPANY, INC.

By its Counsel,

UPTON & HATFIELD, LLP



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Dated: July 27, 2016

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was this day forwarded via Electronic Mail to all persons on the Commission’s official Service List for this matter.



Justin C. Richardson