

The State of New Hampshire

Public Utilities Commission

DW 18-161

Re: Aquarion Water Company of New Hampshire, Inc.

TOWN OF HAMPTON'S PETITION TO INTERVENE

NOW COMES the Town of Hampton in the above entitled matter and petitions the Commission to allow it to intervene in these proceedings as a party, and in support of said petition says as follows:

1. The Town of Hampton has approximately 15,000 year round residents and lies at the heart of the Seacoast region of New Hampshire.
2. The population of Hampton in the summer months rises dramatically to the point where Hampton becomes one of the largest municipalities population-wise in the State.
3. The vast majority of the residents in Hampton receive their water service from Aquarion Water Company of New Hampshire, Inc. (hereinafter, "Aquarion").
4. The Town of Hampton contains about three quarters of the residential customers who are served by Aquarion, and the Town of Hampton's Fire Department utilizes more than half of the public fire hydrants for which Aquarion insures the availability of water.
5. The Petition for Approval filed herein on October 16, 2018 represents a dramatic change in the WICA pilot program in that the Company now seeks to apply an

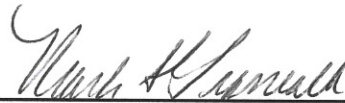
unrelated tax benefit for which customers would be entitled to a refund, to avoid exceeding its WICA cap, and thereby to avoid a rate case in order to reset the WICA clock, where a number of issues with the Company could be raised, such as its overearnings in the years 2016 and 2017.

6. The Town of Hampton has participated in all the recent rate and WICA surcharge cases before this Commission that have been filed by Aquarion.

WHEREFORE, the Town of Hampton requests that the Commission:

- A. Allow the Town of Hampton to intervene as a party in this matter; and
- B. Grant such other and further relief as may be just.


Respectfully submitted,
Town of Hampton
By its Town Attorney



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Certificate of Service

I hereby certify that I have this 13th day of November, 2018 e-mailed the foregoing Petition to Intervene to the Petitioner's Counsel, Marcia A. Brown, in this matter and to the Docket related service list.



Mark S. Gearreald, Esq.