**STATE OF CONNECTICUT**
**PUBLIC UTILITIES REGULATORY AUTHORITY**

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| **RE: PETITION FOR INVESTIGATION INTO THE BILLING PRACTICES OF OLD NEWGATE RIDGE WATER COMPANY** | **:** | **DOCKET NO. 26-09-18** |
| | **:** | **NOVEMBER 9, 2026** |

## MOTION FOR ORDER TO RESPOND TO DISCOVERY

The Office of Consumer Counsel ("OCC") respectfully requests that the Public Utilities Regulatory Authority ("Authority") order Old Newgate Ridge Water Company ("Old Newgate") to respond to interrogatories.

Pursuant to a joint petition from OCC and the Office of Education, Outreach, and Enforcement, on September 25, 2026, the Authority opened the present docket pursuant to General Statutes §§ 16-11, 16-25a, and 16-41 to investigate Old Newgate's billing practices. On October 21, 2026, OCC filed interrogatories OCC-1 through OCC-4 directed to Old Newgate. To date, Old Newgate has not responded to the interrogatories although responses were due on November 4, 2026, and Old Newgate did not seek an extension of time to respond.[1] Having not received responses on November 4, on November 5 OCC emailed the individual indicated on the service list as Old Newgate's representative. To date OCC has not received a response to that email.[2]

Pursuant to General Statues § 16-2a, OCC is authorized to participate in any Authority proceeding "in which such interests of consumers in the state may be involved, or in which matters affecting utility services rendered or to be rendered in this state may be involved." OCC's ability to participate in this investigation is being impacted by Old Newgate's refusal to respond to discovery. As a result, OCC requests that the Authority order Old Newgate to respond to the interrogatories posed by OCC on or before November 18, 2026.[3] If Old Newgate fails to fully respond by the due date, OCC requests that the Authority issue an NOV imposing daily fines

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[1] As noted in a previous investigation, Old Newgate "failed to meet deadlines for filing information necessary to the adjudication of this docket" and "The Company's pattern of failing to meet regulatory obligations and commitments is longstanding." Docket No. 09-02-17, DPUC Investigation into the Adequacy of Service Provided by the Old Newgate Ridge Water Company, Decision dated November 3, 2010, p. 2-3

[2] The Authority also ordered Old Newgate to file data in the record by November 6, 2026. *See* Notice of Proceeding and Procedural Schedule dated October 20, 2026. As of this filing, that response also is not in the docket.

[3] This permits Old Newgate two extra weeks, without having to request an extension, to file interrogatory responses.

pursuant to Conn. Gen. Stat. § 16-41 until Old Newgate responds or that the Authority consider if Old Newgate's repeated failure to meet regulatory obligations indicates a lack of managerial capacity to continue serving customers. *See e.g.*, General Statutes § 16-262l, 16-262o.

Respectfully submitted,

**STATE OF CONNECTICUT**
**OFFICE OF CONSUMER COUNSEL**

**CLAIRE E. COLEMAN**
**CONSUMER COUNSEL**

By: /s/ Kimberly White
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## CERTIFICATE OF SERVICE

I do hereby certify that on this day the foregoing document was filed with the Public Utilities Regulatory Authority, and copies thereof were served upon each person designated on the official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

Dated at New Britain, Connecticut this 9th day of November, 2026.

By: /s/ Kimberly White
Kimberly White
Commissioner of the Superior Court