



**Upton
& Hatfield**^{LLP}
ATTORNEYS AT LAW

Concord Office

10 Centre Street
PO Box 1090
Concord, NH
03302-1090
603-224-7791
1-800-640-7790
Fax 603-224-0320

Attorneys At Law

Robert Upton, II
Gary B. Richardson
John F. Teague
Russell F. Hilliard
James F. Raymond
Barton L. Mayer
Charles W. Grau
Margaret-Ann Moran
Thomas T. Barry*
Bridget C. Ferns
David P. Slawsky
Heather M. Burns
Matthew H. Upton
Lauren Simon Irwin
Kenneth J. Barnes
Matthew R. Serge
Justin C. Richardson
Beth A. Deragon
*Also Admitted In Virginia

Of Counsel

Frederic K. Upton

Hillsborough Office

8 School Street
PO Box 13
Hillsborough, NH
03244-0013
603-464-5578
1-800-640-7790
Fax 603-464-3269

Attorneys At Law

Douglas S. Hatfield
Margaret-Ann Moran
Paul L. Apple

North Conway Office

23 Seavey Street
PO Box 2242
North Conway, NH
03860-2242
603-356-3332
Fax 603-356-3932

Attorney At Law

Robert Upton, II

Portsmouth Office

159 Middle Street
Portsmouth, NH
03801
603-436-7046
Fax 603-431-7304

Attorneys At Law

Russell F. Hilliard
Justin C. Richardson

Please respond to the Portsmouth office

December 8, 2006

Via Hand Delivery

Deborah A. Howland, Executive Director
N.H. Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

Re: City of Nashua: *Petition for Valuation Pursuant to RSA 38:9*
Docket No. DW 04-048

Dear Ms. Howland:

Enclosed please find an original and seven copies, as well as an electronic copy on compact disc, of the following motions submitted on behalf of the City of Nashua's for filing in this proceeding:

(1) *Motion in Limine to Exclude the Testimony of R. Kelley Myers;*

(2) *Motion In Limine Concerning Severance Damages and to Determine the Proper Interpretation Of RSA 38:9; and*

(3) *Motion In Limine to Exclude Limited Update Testimony of Donald Ware and John Guastella.*

A copy of the foregoing is being provided to all parties on the service list by electronic mail, and to Ms. Claire McHugh by first class mail. If you have any questions concerning this filing, please contact me.

Very truly yours,

Justin C. Richardson
jrichardson@upton-hatfield.com

Enclosure(s)

Cc: Official Service List DW-04-048