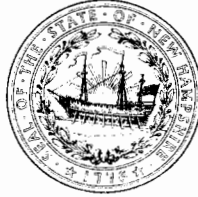


STATE OF NEW HAMPSHIRE

CHAIRMAN
Thomas B. Getz

COMMISSIONERS
Graham J. Morrison
Michael D. Harrington

EXECUTIVE DIRECTOR
AND SECRETARY
Debra A. Howland



PUBLIC UTILITIES COMMISSION
21 S. Fruit Street, Suite 10
Concord, N.H. 03301-2429

Tel. (603) 271-2431

FAX (603) 271-3878

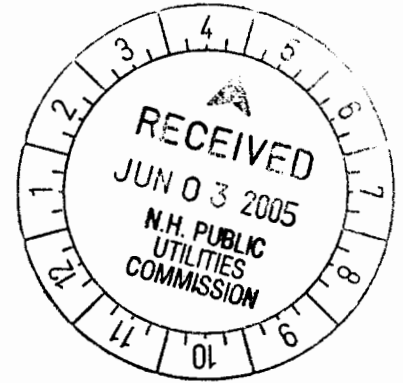
TDD Access: Relay NH
1-800-735-2964

Website:
www.puc.nh.gov

June 3, 2005

Debra Howland, Executive Director and Secretary
N.H. Public Utilities Commission
21 S. Fruit Street, Suite 10
Concord, NH 03301-2429

Re: DW 04-048 City of Nashua Valuation Petition
Staff's Objection to Motion to Limit Data Requests



Dear Ms. Howland:

Attached please find Staff's Objection to the City of Nashua's Motion to Limit Data Requests regarding the above docket.

Thank you in advance for your assistance in this matter.

Sincerely,

A handwritten signature in cursive script that reads "Marcia A. B. Thunberg".

Marcia A. B. Thunberg
Staff Attorney

cc: Service List

**STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION**

City of Nashua: Taking Of Pennichuck Water Works, Inc.

Docket No. DW 04-048

**STAFF'S MOTION TO OBJECT TO CITY OF NASHUA'S MOTION TO LIMIT DATA
REQUESTS**

The Staff of the New Hampshire Public Utilities Commission ("Staff") objects to the City of Nashua's ("Nashua") Motion to Limit Data Requests. In support of this objection, Staff states as follows:

1. By way of Order No. 24, 457, issued on April 22, 2005, the Commission approved a procedural schedule for this docket.
2. Puc 204.04 allows parties to object to data requests. Pursuant to Order No. 24,457, the Commission extended the four (4) day objection deadline to ten (10) days at the behest of the Staff and Parties.
3. Also pursuant to Order No. 24,447, the Commission made clear that it would be available to address discovery disputes as they arise.
4. To date, Staff is not of the opinion that existing safeguards to limit discovery are not effective.
5. After the threshold of ineffectiveness has been established, Staff would be willing to discuss with the Parties setting limits, such as those raised in the City of Nashua's motion, on discovery .

WHEREFORE, Staff respectfully requests that the Commission:

- A. Deny Nashua's Motion to Limit Data Requests; and

B. Grant such other and further relief as the Commission deems necessary
and just.

Respectfully submitted,

New Hampshire Public Utilities Commission Staff

Date: June 3, 2005

By: Marcia A.B. Thunberg
Marcia A.B. Thunberg
21 South Fruit Street, Suite 10
Concord, New Hampshire 03301
Telephone (603) 271-2431

Certificate of Service

I hereby certify that a copy of this Objection to Nashua's Motion to Limit Data Requests
has been forwarded to the parties listed on the Commission's service list in this docket.

Dated: June 3, 2005

Marcia A.B. Thunberg
Marcia A.B. Thunberg