

STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

DW 23-088

PENNICHUCK EAST UTILITY, INC., PITTSFIELD AQUEDUCT COMPANY AND
PENNICHUCK WATER WORKS, INC.

Request for Change in Rates

THE TOWN OF LONDONDERRY'S PETITION TO INTERVENE

The Town of Londonderry ("Londonderry") respectfully petitions to intervene in the above-captioned proceeding, pursuant to N.H. Admin. Rules Puc 203.17, and in accordance with the standards set forth at RSA 541-A:32. The Commission has opened this Docket and proceeding for the purpose of evaluating a consolidated requests for a change in rates by Pennichuck East Utility, Inc. ("PEU"), Pittsfield Aqueduct Company ("PAC"), and Pennichuck Water Works, Inc. ("PWW"). In support of its Petition, Londonderry states as follows:

1. Proposed Intervenor, Londonderry, is a municipal corporation with a principal place of business at 268b Mammoth Road, Londonderry, NH 03053.
2. New Hampshire Code of Administrative Rules Puc 203.17 provides that the Commission shall grant petitions to intervene in accordance with the standards set forth in RSA 541-A:32. RSA 541-A:32 provides that a petition to intervene shall be granted when a petitioner demonstrates that it has "rights, duties, privileges, immunities or other substantial interests" that may be affected by the proceeding, and "the interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention."
3. As described below, the Town has rights and substantial interests that will be affected by the proceeding.

4. PEU is a supplier of water resources to Londonderry, several of its municipal buildings, its fire hydrants, and 2,466 Londonderry customers. See Petition Ex JJB-1 (for number of customers).

5. The Petition seeks to consolidate the rates of PEU, PAC, and PWW by approving the application of PWW rates to customers of PEU, PWW, and PAC under a consolidated single tariff with new rates.

6. The relief requested will affect the costs that Londonderry and its residents pay to receive water from PEU.

7. Moreover, water costs in the community directly impact land values and economic development within the municipality.

8. Thus, Londonderry has “rights, duties, privileges, immunities or other substantial interests” that may be affected in this proceeding. RSA 541-A:32.

9. Londonderry intervened based on similar rights and interests in PEU’s last rate case, docketed DW 20-156.

10. Further, “the interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention.” RSA 541-A:32.

WHEREFORE, Londonderry respectfully requests that the Commission:

- A. Grant this Petition to Intervene in Docket 23-088;
- B. Add Londonderry to the service list, and treat it as a full party and participant in the docketed proceedings; and
- C. Grant such other and further relief as the Commission deems just.

Dated: January 19, 2023

By: Respectfully submitted,

TOWN OF LONDONDERRY

By Their Attorney,

SHEEHAN PHINNEY, BASS & GREEN, P.A.

/s/ Ryan Lirette

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was electronically filed with the Commission and was sent to the persons set forth in the service list for this Docket.

/s/ Ryan P. Lirette
Ryan P. Lirette