

# McLane

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*Professional Association*

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OFFICES IN:  
MANCHESTER  
CONCORD  
PORTSMOUTH

January 3, 2007

**Via Hand Delivery**

Debra A. Howland  
Executive Director and Secretary  
New Hampshire Public Utilities Commission  
21 S. Fruit Street, Suite 10  
Concord, NH 03301

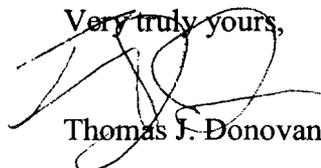


**Re: DW 04-048; City of Nashua—Taking of Pennichuck Water Works, Inc.**

Dear Ms. Howland:

On behalf of the Pennichuck Companies, and pursuant to the secretarial letter dated November 22, 2006, I enclose for filing with the Commission an original and six copies of the witness list and schedule for the hearing beginning on January 10, 2007, as well as an original and six copies of the exhibits lists for Pennichuck, the Staff, and the Intervenors opposed to Nashua's Petition. In addition, I enclose four CD-Rom's containing the Pennichuck, Staff and Intervenor exhibits. Please note that the CDs include all of the prefiled testimony but do not contain any of the confidential exhibits. I also enclose the original (stickered) hard copy of each exhibit, excluding the prefiled testimony (per secretarial letter dated November 22, 2006), and excluding the confidential exhibits. These same exhibits will be made available to all parties in the docket at the following file transfer protocol web site by 4 PM today: <ftp://64.223.134.21>. That site is now password protected. The user name is *ftp\_user* and the password is *mcclane*.

If you have any questions, please do not hesitate to call.

Very truly yours,  
  
Thomas J. Donovan

Enclosures

cc: Service List (by electronic mail only)  
Duane C. Montopoli, CEO and President, Pennichuck Corporation  
Donald Ware, President, Pennichuck Water Works, Inc.

STATE OF NEW HAMPSHIRE  
BEFORE THE  
PUBLIC UTILITIES COMMISSION

*City of Nashua: Petition for Valuation Pursuant to RSA 38.*

DW 04-048

**WITNESS SCHEDULE**

<u>Date</u>	<u>Pre-filed Testimony to be Submitted</u>
<u>January 10, 2007</u>	
Brian McCarthy Bernard Streeter, David Rootovich and George E. Sansoucy, as a panel	November 22, 2004, May 22, 2006 July 20, 2006
Steven Adams (written submission only)	November 22, 2004 and Stipulation
Steven Paul (written submission only)	November 22, 2004, May 22, 2006
Brendan Cooney	May 22, 2006
Carol Anderson and Ruth Raswyck, as a panel	May 22, 2006
<u>January 11, 2007</u>	
George E. Sansoucy and Glenn C. Walker, as a panel	November 22, 2004, January 12, 2006, May 22, 2006, November 14, 2006
<u>January 16, 2007</u>	
Philip G. Ashcroft, David W. Ford, Robert R. Burton and Paul F. Noran, as a panel	January 12, 2006 May 22, 2006 July 20, 2006
<u>January 17, 2007</u>	
Stephen R. Gates, Paul B. Doran	

and Jack M. Henderson, as a panel January 12, 2006

Katherine Hersh, Brian McCarthy  
and Jack Henderson, as a panel May 22, 2006

Allan Fuller May 22, 2006

January 18, 2007

Nashua witnesses (if needed)

Intervenor witnesses:

Barbara Pressley April 22, 2005  
January 12, 2006  
May 22, 2006

Claire McHugh April 22, 2005

David McCray January 12, 2006  
(Richard Hinch)

Michael Scanlon April 22, 2005

William Ruoff January 12, 2006  
and Gary Daniels, as a panel

Dennis Nesbit January 12, 2006

January 23, 2007

Donald Correll January 12, 2006  
February 27, 2006

Donald Ware January 12, 2006  
February 27, 2006  
May 22, 2006  
November 14, 2006

January 24, 2007

Donald Ware (continued)

Bonalyn Hartley January 12, 2006

John Joyner	February 27, 2006
R. Kelly Myers	January 12, 2006

January 25, 2007

Eileen Pannetier	January 12, 2006
Douglas Patch	January 12, 2006
Harold Walker (written submission only)	January 12, 2006
Russell Thibeault	January 12, 2006
John Guastella	January 12, 2006 May 22, 2006 November 14, 2006

January 30, 2007

Robert Reilly and Richard Riethmiller, as a panel	January 12, 2006, May 22, 2006 November 14, 2006
Philip L. Munck* (Nashua witness)	November 22, 2004

January 31, 2007

Pennichuck witnesses (if needed)	
Staff witnesses:	
Mark Naylor	April 13, 2006
Amanda Noonan	April 13, 2006
Randall Knepper	April 13, 2006

February 1, 2007

Staff witnesses (if needed)	
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\* The parties do not agree whether this witness may be called in this proceeding. Nashua does not intend to proffer the pre-filed testimony of Mr. Munck and asserts that without such pre-filed testimony he cannot be called as a witness by Pennichuck. Pennichuck reserves the right to call Mr. Munck.

STATE OF NEW HAMPSHIRE

PUBLIC UTILITIES COMMISSION

City of Nashua – Taking of Pennichuck Water Works, Inc.

DW 04-048

STAFF EXHIBIT LIST

<u>Exhibit No.</u>	<u>Description</u>
5001.	Testimony of Mark A. Naylor - 4/13/06
5002.	Testimony of Randall Knepper – 4/13/06
5003.	Testimony of Amanda Noonan – 4/13/06
5004.	MRWC to Nashua DR 1-1 – 1-3
5005.	Staff to Nashua DR 1-37
5006.	Staff to Nashua DR 4-1,4-2,4-3,4-20,4-24,4-25,4-15,4-26,4-27,4-29,4-30,4-31,4-80,4-89,4-90,4-91,4-92,4-93,4-94,4-95,4-96
5007.	Staff to Nashua DR 5-7(5-S1,5-S5),5-11(5-S2), 5-13(5-S4),5-15(5-S3), 5-16(5-S6,5-S7)
5008.	PWW to Nashua DR 2-12,2-17,2-18,2-20
5009.	PWW to Nashua DR 3-3,3-6,3-12,3-16,3-24,3-28,3-30,3-44,3-45,3-48,3-49,3-75,3-79,3-86,3-87,3-94,3-99
5010.	PWW to Nashua DR 4-1,4-2,4-4,4-6,4-8
5011.	PWW to Nashua DR 5-59,5-83,5-96,5-131
5012.	A-B to Nashua 1-1,1-4,1-6,1-7,1-8,1-9,1-10
5013.	PWW to Bedford 1-9
5014.	Nashua to Staff 6-1 through 6-66
5015.	PWW Current Tariff

Staff reserves the right to offer other exhibits for impeachment or use in cross-examination or in rebuttal and any blow-up or enlargement of an exhibit and any charts, drawings, graphics or “chalks” prepared during the hearing. Staff also reserves the right to use deposition transcript excerpts with witnesses for impeachment and related purposes.

**STATE OF NEW HAMPSHIRE**

**PUBLIC UTILITIES COMMISSION**

**City of Nashua – Taking of Pennichuck Water Works, Inc.**

**DW 04-048**

**EXHIBIT LIST FOR INTERVENORS OPPOSING THE PETITION**

- 4001. Testimony of Gary L. Daniels -1/12/06
- 4002. Testimony of William F. Ruoff -1/12/06 with Exhibit
- 4003. Testimony of Richard Hinch - 1/12/06
- 4004. Testimony of Dennis Nesbit - 1/12/06 with Exhibits
- 4005. PWW-MVD Contract -1996
- 4006. PWW-MVD Contract - 2004

The Intervenors reserve the right to offer other exhibits for impeachment or use in cross-examination or in rebuttal and any blow-up or enlargement of an exhibit and any charts, drawings, graphics or “chalks” prepared during the hearing. The Intervenors also reserve the right to use deposition transcript excerpts with witnesses for impeachment and related purposes.

STATE OF NEW HAMPSHIRE

PUBLIC UTILITIES COMMISSION

City of Nashua – Taking of Pennichuck Water Works, Inc.

DW 04-048

PENNICHUCK'S EXHIBIT LIST

<u>Exhibit No.</u>	<u>Description</u>
3001.	Testimony of Donald L. Correll -1/12/06
3001A.	Exhibits to Testimony of Donald L. Correll -1/12/06
3002.	Testimony of Douglas Patch – 1/12/06
3002A.	Exhibits to Testimony of Douglas Patch – 1/12/06
3003.	Testimony of Bonalyn J. Hartley – 1/12/06
3003A.	Exhibits to Testimony of Bonalyn J. Hartley – 1/12/06
3003B.	Exhibits to Testimony of Bonalyn J. Hartley – 1/12/06 – Continued
3004.	Testimony of Donald L. Ware – 1/12/06
3004A.	Exhibits to Testimony of Donald L. Ware – 1/12/06
3005.	Testimony of Eileen Pannetier – 1/12/06
3005A.	Exhibits to Testimony of Eileen Pannetier – 1/12/06
3005B.	Exhibits to Testimony of Eileen Pannetier – 1/12/06 - Continued
3005C.	Exhibits to Testimony of Eileen Pannetier – 1/12/06 - Continued
3005D.	Exhibits to Testimony of Eileen Pannetier – 1/12/06 - Continued
3005E.	Exhibits to Testimony of Eileen Pannetier – 1/12/06 - Continued
3006.	Testimony of R. Kelly Myers – 1/12/06
3007.	Testimony of Robert F. Reilly – 1/12/06
3007A.	Exhibits to Testimony of Robert F. Reilly – 1/12/06
3007X.	Confidential Pages to Testimony of Robert F. Reilly – 1/12/06

**Exhibit No.****Description**

3008.	Testimony of Richard Riethmiller - 1/12/06
3008A.	Exhibits to Testimony of Richard Riethmiller - 1/12/06
3009.	Testimony of Harold Walker, III – 1/12/06
3009A	Exhibits to Testimony of Harold Walker, III – 1/12/06
3010.	Testimony of John F. Guastella – 1/12/06
3010A.	Exhibits to Testimony of John F. Guastella – 1/12/06
3010X.	Confidential Pages to Testimony of John F. Guastella – 1/12/06
3011.	Testimony of Russell Thibeault - 1/12/06
3011A.	Exhibits to Testimony of Russell Thibeault - 1/12/06 - Continued
3011B.	Exhibits to Testimony of Russell Thibeault - 1/12/06 - Continued
3011C.	Exhibits to Testimony of Russell Thibeault - 1/12/06 - Continued
3011D.	Exhibits to Testimony of Russell Thibeault - 1/12/06 - Continued
3011E.	Exhibits to Testimony of Russell Thibeault - 1/12/06 - Continued
3011F.	Exhibits to Testimony of Russell Thibeault - 1/12/06 - Continued
3011G.	Exhibits to Testimony of Russell Thibeault - 1/12/06 - Continued
3011H.	Exhibits to Testimony of Russell Thibeault - 1/12/06 - Continued
3012.	Testimony of Donald L. Correll – 2/27/06
3012A.	Exhibits to Testimony of Donald L. Correll – 2/27/06
3012B.	Exhibits to Testimony of Donald L. Correll – 2/27/06 - Continued
3012C.	Exhibits to Testimony of Donald L. Correll – 2/27/06 - Continued
3013.	Testimony of John Joyner – 2/27/06
3013A.	Exhibits to Testimony of John Joyner – 2/27/06
3014.	Testimony of Donald L. Ware – 2/27/06

<b><u>Exhibit No.</u></b>	<b><u>Description</u></b>
3014A.	Exhibits to Testimony of Donald L. Ware – 2/27/06
3015.	Reply Testimony of Donald L. Ware - 5/22/06
3015A.	Exhibits to Reply Testimony of Donald L. Ware - 5/22/06
3015B.	Exhibits to Reply Testimony of Donald L. Ware - 5/22/06 - Continued
3015C.	Exhibits to Reply Testimony of Donald L. Ware - 5/22/06 - Continued
3015D.	Exhibits to Reply Testimony of Donald L. Ware - 5/22/06 - Continued
3015E.	Exhibits to Reply Testimony of Donald L. Ware - 5/22/06 - Continued
3015F.	Exhibits to Reply Testimony of Donald L. Ware - 5/22/06 - Continued
3016.	Reply Testimony of John F. Guastella - 5/22/06
3016A.	Exhibits to Reply Testimony of John F. Guastella - 5/22/06
3016B.	Exhibits to Reply Testimony of John F. Guastella - 5/22/06 –Continued
3016X.	Confidential Exhibit to Reply Testimony of John F. Guastella – 5/22/06
3017.	Reply Testimony of Robert F. Reilly – 5/22/06
3017A.	Exhibits to Reply Testimony of Robert F. Reilly – 5/22/06
3018.	Reply Testimony of Richard Riethmiller – 5/22/06
3019.	Limited Update Testimony of Donald L. Ware – 11/14/06
3020.	Limited Update Testimony of John F. Guastella – 11/14/06 (with Exhibits)
3020X.	Confidential Exhibit to Limited Update Testimony of John F. Guastella – 11/14/06
3021.	Limited Update Testimony of Robert F. Reilly – 11/14/06
3021A.	Exhibits to Limited Update Testimony of Robert F. Reilly – 11/14/06

<b><u>Exhibit No.</u></b>	<b><u>Description</u></b>
3021B.	Exhibits to Limited Update Testimony of Robert F. Reilly – 11/14/06 - Continued
3021X.	Confidential Exhibit to Limited Update Testimony of Robert F. Reilly – 11/14/06
3022.	Karen White Philadelphia Suburban Testimony 12/10/02 (Dep. Ex. 2)
3023.	Jay Gonzalez 9/13/04 opinion letter re District bonding authority (Dep. Ex. 13)
3024.	Draft Marketing Strategy Memo re 1/14/03 referendum (Dep. Ex. 14)
3025.	Hersh memo to Woodbury (Hollis) - 5/5/04 (Dep. Ex. 30)
3026.	Hersh memo to Sansoucy re RFP – 9/23/04 (Dep. Ex. 33)
3027.	Hersh email re Sansoucy phone call – 10/20/04 (Dep. Ex. 36/71)
3028.	Sansoucy email to Streeter re other consultants – 9/1/04 (Dep. Ex. 37/77)
3029.	Adams letter to Anderson re Sansoucy proposal – 2/18/04 (Dep. Ex. 53)
3030.	Munck email to N. Christley (Ashtabula) – 5/3/02 (Dep. Ex. 54)
3031.	Munck email to Hersh – 4/12/05 (Dep. Ex. 59)
3032.	Munck email to Sousa re PUC testimony – 11/22/04 (Dep. Ex. 62)
3033.	Munck email to Streeter re PUC order – 1/22/05 (Dep. Ex. 63)
3034.	Sansoucy web site page (Dep. Ex. 68)
3035.	Sansoucy letter to Crombie re appraisal – 12/12/02 (Dep. Ex. 69)
3036.	Sansoucy signed contract with Nashua – 3/19/04 (Dep. Ex. 70)
3037.	Hersh emails to Sansoucy re RFP process – 1/4/05 (Dep. Ex. 72)
3038.	Sansoucy email to Hersh with response to Hollis – 5/24/04 (Dep. Ex. 73)

<b><u>Exhibit No.</u></b>	<b><u>Description</u></b>
3039.	Munck email re corporate and web site matters – 6/23/04 (Dep. Ex. 74)
3040.	Connell email to Upton re MVRWD – 6/23/04 (Dep. Ex. 75)
3041.	Sansoucy contract amendment with Nashua – 5/05 (Dep. Ex. 78)
3042.	Sansoucy statement to Nashua – 5/31/05 (Dep. Ex. 79)
3043.	Veolia proposal Section Six (alternative proposal) (Dep. Ex. 81)
3044.	Veolia draft contract with Nashua – 12/23/05 (Dep. Ex. 83) – Part 1 of 2
3044A.	Veolia draft contract with Nashua – 12/23/05 (Dep. Ex. 83) – Part 2 of 2
3045.	Veolia price proposal with metrics – 9/6/05 (Dep. Ex. 84)
3046.	Veolia proposal Section Five (experience) (Dep. Ex. 87)
3047.	Beck draft subcontract with TetraTech (Dep. Ex. 91)
3048.	Veolia response to PWW DR 3-1 re operation of water systems (Dep. Ex. 93) – Part 1 of 2
3048A.	Veolia response to PWW DR 3-1 re operation of water systems (Dep. Ex. 93) – Part 2 of 2
3049.	Nashua wastewater bill (Dep. Ex. 101)
3050.	PWW water bill (Dep. Ex. 102)
3051.	Veolia draft presentation with organizational chart (excerpt) – 8/18/05 (Dep. Ex. 105)
3052.	Veolia answer to PWW DR 4-49 re O&M revenues (Dep. Ex. 106)
3053.	Veolia draft presentation with organizational chart (excerpt) (Dep. Ex. 109)
3054.	Veolia/Nashua MOU April 14, 2006 re additional services (Dep. Ex. 111)
3055.	Aldermanic Water Committee minutes excerpt - 1/30/06 (Dep. Ex. 112)
3056.	Professional Services Group Bridgeport press release (Dep. Ex. 114)

<u>Exhibit No.</u>	<u>Description</u>
3057.	Aldermanic Water Committee minutes excerpt - 9/6/05 (Dep. Ex. 116)
3058.	Veolia Indianapolis customer service billing telephone logs (Dep. Ex. 117)
3059.	Sansoucy Pennichuck Valuation Estimate – 12/31/02 (Sans. Dep. Ex. 3)
3060.	Sansoucy PEU (Londonderry) valuation – 4/1/05 (Sans. Dep. Ex. 4)
3061.	Sansoucy PWW (Nashua) valuation – 4/1/95 (Sans. Dep. Ex. 6)
3062.	Sansoucy utility (Hooksett) valuation – 4/1/03 (Sans. Dep. Ex. 7)
3063.	Sansoucy cost approach work papers (Sans. Dep. Ex. 8)
3064.	G. Walker sales approach work papers (G.Wal. Dep. Ex. 1)
3065.	(PWW to Nashua DR 1-3)
3066.	Model for assumed acquisition price of \$81 million (PWW to Nashua DR 1-7)
3067.	(P to N – DR 1-8)
3068.	Re PWW focus on return to shareholders (P to N - DR 1-15)
3069.	P to N – DR 1-14
3070.	P to N – DR 1-22
3071.	Satellite systems relation to core (P to N - DR 1-26)
3072.	P to N – DR 1-27
3073.	Other geographically diverse municipal water utilities (P to N - DR 1-30)
3074.	Court/agency qualifications of Sansoucy (P to N - DR 1-31)
3075.	Adams financial model assumptions (P to N - DR 1-44)
3076.	Presumption of public interest re Pennichuck assets (P to N - DR 1-72)
3077.	Re PWW supply of clean/affordable drinking water (P to N - DR 1-98)

**Exhibit No.****Description**

3078. Re Nashua DPW no role re operations of PWW (P to N - DR 1-111)
3079. Re Nashua employees with water supply experience (P to N - DR 1-119)
3080. Nashua's operation of city departments have no relevance to operation of a water system (P to N - DR 1-127)
3081. Re adequacy of fire protection water flows (P to N - DR 1-129)
3082. Nashua desire for outside oversight contractor (P to N - DR 1-167)
3083. Re current rate structure for out of town customers and cost of service study (P to N - DR 1-168)
3084. Nashua relationship to PUC regulation (P to N - DR 1-169)
3085. Nashua re RSA 38 and public interest standard (P to N - DR 1-172)
3086. Nashua willingness for higher rates than PWW (P to N - DR 2-1)
3087. P to N - DR 2-6
3088. Re no Nashua complaints to PUC re PWW (P to N - DR 2-14)
3089. Re irrelevance of Nashua combined sewer overflow plan (P to N - DR 2-25)
3090. Beck contract with Nashua 10/26/05 version (attachment) (P to N - DR 3-14)
3091. PWW credit for CIAC holdings (P to N - DR 3-17)
3092. Re water systems with both operation and oversight contractors (P to N - DR 3-31)
3093. Sansoucy focused on cost approach, depreciation, rates; Walker on income and sales approach (P to N - DR 3-52)
3094. P to N - DR 3-53
3095. P to N - DR 3-57
3096. P to N - DR 3-60
3097. P to N - DR 3-61

**Exhibit No.****Description**

3098.	P to N – DR 3-62
3099.	Limitations to Sansoucy cost approach (P to N – DR 3-65)
3100.	The Appraisal of Real Estate (12 <sup>th</sup> Ed.), USPAP, Handy-Whitman, Bonbright text, Woolery text as authoritative (P to N – DR 3-66)
3101.	The Appraisal of Real Estate (12 <sup>th</sup> Ed.), USPAP, Handy-Whitman, Bonbright text, Woolery text as authoritative (P to N – DR 3-67)
3102.	Trended original cost limited by original cost information (P to N – DR 3-68)
3103.	P to N – DR 3-69
3104.	Appraiser's management of income approach (P to N – DR 3-70)
3105.	Appraiser's management of market sales analysis (P to N – DR 3-71)
3106.	P to N – DR 3-72
3107.	P to N – DR 3-73
3108.	P to N – DR 3-74
3109.	P to N – DR 3-78
3110.	P to N – DR 3-81
3111.	P to N – DR 3-82
3112.	P to N – DR 3-83
3113.	Nashua to supply the GIS system (P to N – DR 3-98)
3114.	P to N – DR 4-2
3115.	P to N – DR 4-9
3116.	Unaware of a municipality owning a core with disconnected systems outside of it (P to N – DR 5-31)
3117.	Fuller view of closure of Tinker Road and Manchester Street bridges (P to N – DR 5-34)
3118.	Fuller view of closure of Everett Turnpike (P to N – DR 5-35)
3119.	Sansoucy and Walker jointly responsible for reply testimony (P to N – DR 5-42)

<b><u>Exhibit No.</u></b>	<b><u>Description</u></b>
3120.	Customer service (P to N – DR 5-45)
3121.	P to N – DR 5-54
3122.	Fuller Ex 5-1 – Sasaki Report (excerpts) (P to N – DR 5-111)
3123.	Fuller view on Sasaki conclusions (P to N – DR 5-133)
3124.	Fuller view on Order No. 16,373 (P to N – DR 5-134)
3125.	Staff to Nashua DR 1-8
3126.	Staff to Nashua DR 1-11
3127.	Nashua commitment re troubled water system (Staff to Nashua - DR 1-14)
3128.	Nashua re PWW's service (Staff to Nashua - DR 1-33)
3129.	Staff to Nashua DR 1-42
3130.	Staff to Nashua DR 1-57
3131.	Staff to Nashua DR 1-62
3132.	Staff to Nashua DR 1-65
3133.	Nashua factors to take on a troubled system (Staff to Nashua - DR 2-7)
3134.	Preparation of water ordinance and the RFPs (Staff to Nashua - DR 2-15)
3135.	Pennichuck and Sanderson Farm planning board approval (Staff to Nashua - DR 2-16)
3136.	Agreement to pay PILOT to other communities (Staff to Nashua - DR 3-2)
3137.	Staff to Nashua DR 3-2
3138.	PWW engineering overhead; employee benefits (Staff to Nashua - DR 3-23)
3139.	Veolia's Nashua employee levels (Staff to Nashua - DR 3-24)
3140.	Staff to Nashua DR 3-25
3141.	Nashua re satellites service at Nashua rates (Staff to Nashua - DR 4-33)
3142.	Nashua will provide vehicles, computers, computer programs (Staff to Nashua - DR 4-45)

<b><u>Exhibit No.</u></b>	<b><u>Description</u></b>
3143.	Staff to Nashua DR 4-46
3144.	Veolia employees in Nashua, elsewhere (Staff to Nashua - DR 4-53)
3145.	Nashua water ordinance main extension policy (Staff to Nashua - DR 4-91)
3146.	New, troubled systems and water ordinance (Staff to Nashua - DR 4-94)
3147.	Fuller re dredging the ponds (Staff to Nashua - DR 5-12)
3148.	Nashua development in the watershed (Staff to Nashua - DR 5-13)
3149.	PWW compliance with WPD ordinance (Staff to Nashua - DR 5-15)
3150.	PWW compliance with WPD ordinance (Staff to Nashua - DR 5-17)
3151.	Nashua re water protection ordinances before 1998 (Staff to Nashua - DR 5-18)
3152.	Nashua approved amended subdivision re Sanderson Farm (Staff to Nashua - DR 5-19)(attachment)
3153.	Re staff 5-17, WPD ordinance introduced from development proposal re Bowers Pond (Sanderson Farm). (Staff to Nashua - DR 5-S1)
3154.	PWW veto power over developments (Staff to Nashua - DR 5-S5)
3155.	Aldermen will review all special contracts (AB to Nashua - DR 1-3)
3156.	Nashua re existing rate structure and cost of service study (AB to Nashua - DR 1-1)
3157.	AB to Nashua - DR 1-2
3158.	PUC regulation of contracts; rate adjustments (AB to Nashua - DR 1-5)
3159.	Critical Elements of an Acceptable Acquisition of Pennichuck 11/25/03 (P to B - DR 2-1)
3160.	Milford and Merrimack special contracts compared with Nashua rates (N to S - DR 6-8)
3161.	Nashua testimony re rates for satellites (N to S - DR 6-16)

<u>Exhibit No.</u>	<u>Description</u>
3162.	Nashua oversight and effective ownership approach (N to S - DR 6-30)
3163.	Loss of scale and PEU/PAC efficiency (N to S - DR 6-36)
3164.	Troubled water systems acquired by Pennichuck companies (N to S - DR 6-45)
3165.	Veolia role re small troubled systems (N to S - DR 6-56)
3166.	Re suggested conditions to Nashua re public interest (N to S - DR 6-61)
3167.	Nashua employees for customer service (N to S - DR 6-64)
3168.	Veolia participation in industry groups re preventing underground damage (N to S - DR 6-66)
3169.	List of licenses, permits to withdraw water – attachment (N to P - DR 1-5)
3170.	Total yield from ponds and Merrimack (N to P - DR 1-7)
3171.	Peak day and average day usage spread sheets – attachment (N to P - DR 1-28)
3172. X	2005-09 capital improvement plan – attachment (confidential)(N to P - DR 1-39)
3173.	Calculation re value of PNNW stock if acquired by PSC (attachment) (N to P - DR 3-40)
3174.	Current PWV-USWA collective bargaining agreement (attachment) (N to P - DR 3-75)
3175.	PWW customer service efforts (N to P - DR 3-79)
3176.	Nashua re DIG SAFE, its street opening ordinance (N to P - DR 3-82)
3177.	PWW conservation efforts with customers (N to P - DR 3-83)
3178.	Manchester proposed Merrimack River withdrawal (N to P - DR 4-22)
3179.	Photos re Nashua street opening ordinance – attachment (N to P - DR 4-43)
3180.	CEI's plans for Pennichuck Sq and Celina Ave. improvements (attachment) (N to P - DR 4-54)

**Exhibit No.****Description**

3181. Press release re New Orleans and PSG (attachment PW 022031-32) (N to P - DR 5-4)
3182. Analysis of PWW vs. Veolia planned vs. unplanned maintenance (N to P - DR 5-24)
3183. ISO requirements re hydrant tests (N to P - DR 7-14)(attachment)
3184. 2005 pumpage from Nashua treatment plant, AVD and Bon Terrain wells (S to P - DR 3-12)
3185. 2005 water supplied to Milford, Hudson, from MVD (S to P - DR 3-13)
3186. 2005 water supplied to AVD and Bon Terrain customers (S to P - DR 3-15)
3187. PWW “brief overview” for union and non-union employees (confidential) (attachment) (S to P - DR 4-14)
3188. Pennichuck vs. PWW organizational chart (attachment) (confidential) (S to P - DR 4-15)
3189. PWW vs. Nashua hypothetical repair examples (original and supp. & attachment) (S to P - DR 4-19)
3190. Projections for PWW water demand through 2024 (attachment) (S to P - DR 4-20)
3191. Consequences to remainder of Pennichuck after taking of PWW (S to P - DR 4-21)
3192. 2000 sediment study re silt and storage capacity of ponds (S to P - DR 5-2)
3193. Report on water quality above and below Merrimack River input (S to P - DR 5-3)
3194. Sasaki and 1998 WMP re Nashua ordinance (S to P - DR 5-7)
3195. The Appraisal of Real Estate (12<sup>th</sup> Ed.) excerpts (Mot. Lim. Ex. 10)
3196. USPAP (2004 ed.) excerpts (Mot. Lim. Ex. 11)
3197. Nashua aldermanic budget review committee March 16, 2004 excerpts (Mot. Lim. Ex. 12)
3198. Nashua aldermanic special water committee June 29, 2006 minutes excerpts (Mot. Lim. Ex. 21)

<u>Exhibit No.</u>	<u>Description</u>
3199.	Nashua aldermanic special water committee May 8, 2006 minutes excerpts (Sansoucy) (Mot. Lim. Ex. 22)
3200.	Hanover Water Works October, 2001 valuation excerpts (Mot. Lim. Ex. 27)
3201.	FERC Order February 14, 1985 consent order
3202.	Niagara Mohawk v. Cohoes February 1, 2001 order
3203.	Niagara Mohawk v. Marcy order (excerpts)
3204.	Wayne County v. Michigan Tax Comm. April 5, 2002
3205.	EnergyNorth v. Nashua (Superior Court) February 14, 1995
3206.	Sansoucy letter re Rochester telephone pole valuation - 7/28/06
3207.	Sansoucy memo to Szeman (Geneva OH) 9/6/01
3208.	Munck letter to Szeman – undated
3209.	Sansoucy 2002 Philadelphia Suburban Testimony
3210.	Sansoucy 7/11/96 appraisal of Consumers Water Company (excerpts)
3211.	Sansoucy June 1994 valuation of Portland Pipeline property in Gorham excerpted
3212.	Sansoucy Valuation of Utility Property presentation to NY State Real Property Tax Directors August 8, 1995 excerpts
3213.	Nashua Audited Financial Report YE June 30, 2005 excerpts
3214.	Nashua documents re Sanderson Farms
3215.	Nashua FY 2007 budget excerpts
3216.	Philadelphia Suburban Prehearing Conference excerpts 7/19/02
3217.	4/26/05 Nashua special aldermanic water committee excerpts
3218.	12/11/06 Nashua special aldermanic water committee minutes excerpt
3219.	PSG v. Rockland Special Verdict Form August 25, 2006

<b><u>Exhibit No.</u></b>	<b><u>Description</u></b>
3220.	Mass. Office of Inspector General 2004 Annual Report excerpt
3221.	Local 131 News Release re Indianapolis
3222.	Atlanta v. Veolia July 11, 2006 complaint
3223.	Veolia March 21, 2002 Indianapolis Contract excerpt with exhibits
3224.	Local 131 January 1, 1999 collective bargaining agreement excerpts
3225.	Local 131 May 12, 2004 collective bargaining agreement excerpts
3226.	US Conference of Mayors January 27, 2006 Press Release; US Conference of Mayors 2006 Award Application; US Conference of Mayors Business Council
3227.	Indianapolis 1/6/05 boil water advisory; IDEM 1/28/02 MCL exceedence letter; 1/29/02 public information notice; 1/13/03 public information notice; 1/20/05 boil water notice; 1/17/04 public information notice
3228.	Nashua Telegraph articles & documents re water protection ordinance
3229.	Nashua aldermanic special water committee minutes – 3/29/04
3230.	Nashua aldermanic special water committee minutes – 3/31/04
3231.	Munck water utility transition outline to Sansoucy – 5/7/04
3232.	Munck email to Sansoucy with briefing outline - 5/9/05
3233.	Munck memo to Sansoucy re staff data requests – 5/13/05
3234.	Munck email to Anderson re financial plan – 11/9/04
3235.	Sansoucy letter to Anderson re payment – 1/7/05
3236.	Sansoucy recent experiences page

<u>Exhibit No.</u>	<u>Description</u>
3237.	Hudson response to interrogatories in So. NH Water v Hudson – 6/10/93
3238.	Sansoucy water utility acquisition briefing to alderman – 12/28/04
3239.	Nashua documents re Best Ford variance
3240.	Nashua and Merrimack subdivision approvals in watershed
3241.	PUC Order No. 16,373 (April 29, 1983)
3242.	Nashua Telegraph articles re city government - 2006
3243.	Nashua growth rate; bottling facilities (DW 02-12 Pennichuck to Nashua DR 1-29, 1-62)
3244.	Aqua America stock chart – 12/29/06
3245.	E-mail from Anderson to Streeter - 5/14/04
3246.	City of Nashua Draft Water Ordinance - 12/11/06
3247.	Photograph of Pennichuck employees
3248.	Sansoucy August 1994 valuation of EnergyNorth Natural Gas, Inc. excerpted
3249.	Sansoucy August 1999 valuation of Tomhannock Reservoir excerpted
3250.	Sansoucy November 19, 1996 valuation of Pittsfield Aqueduct Company, Inc. excerpted
3251.	Sansoucy October 28, 1991 valuation of Pine Plains Water Company excerpted

Pennichuck reserves the right to offer other exhibits for impeachment or use in cross-examination or in rebuttal and any blow-up or enlargement of an exhibit and any charts, drawings, graphics or “chalks” prepared during the hearing. Pennichuck also

reserves the right to use deposition transcript excerpts with witnesses for impeachment and related purposes.