

STATE OF NEW HAMPSHIRE

BEFORE THE

PUBLIC UTILITIES COMMISSION



In the matter of the Determination of the Fair Market Value Of The Plant and Property of Pennichuck Water Works, Inc. Pennichuck East Utility, Inc. and Pittsfield Aquaduct Company, Inc.

Petition for Valuation by the City of Nashua, NH

Motion to Intervene

NOW COMES the Town of Hollis and respectfully requests that this Honorable Commission grant it intervenor status in the above captioned matter pursuant to RSA 541-A:32 Intervention.

In support thereof the Town of Hollis states the following:

- 1. Pennichuck Water Works, Inc. provides water service to sixty eight customers in the Town of Hollis.
- 2. The aquifer in North Hollis contributes up to 40% of the water entering the Pennichuck watershed, thus, the rights, duties, privileges, immunities and substantial interests of its citizenry will be affected by this proceeding.
- 3. Moreover, should the demands on the aquifer increase, the total reserve of the aquifer will be lowered and the residents of Hollis will have decreased water levels for their wells directly effecting land values and economic development within the municipality.
- 4. The interests of justice would be served and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention.

Wherefore, the Town of Hollis respectfully requests that this Commission;

- 1. Grant it full intervenor status in this proceeding; or
- 2. Grant such other relief as is just and reasonable.

Respectfully submitted The Town of Holi

Johnson, Chairman, Board of Selectmen

CERTIFICATION

I hereby certify that a copy of the forgoing motion has been forwarded via first class mail this date to Commission Staff, the City of Nashua, NH, the Pennichuck Corporation, and the Office of the Consumer Advocate.

July 13, 2004

July 12, 2004

COPY TO:

F. Anne Ross Officer of Consumer Advocate 117 Manchester St. Concord, NH 03301

Steve Camerino, Esq. McLane, Graf, Raulson & Middleton, PA 900 Elm Street PO Box 326 Manchester, NH 03105-0326 Mayor Bernie Streeter Nashua City Hall 229 Main Street Nashua, NH 03060

Donald Correll, CEO Pennichuck Corp. 4 Water Street Nashua, NH 03060 Debra Howland, Executive Direct Public Utilities Commission 8 Old Suncook Road Concord, NH 03301