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July 15, 2004

Debra Howland, Executive Director
NH Public Utilities Commission
8 Old Suncook Road
Concord, NH 03301-7319

Re: DW 04-048/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.

Dear Ms. Howard:

Enclosed please find an original and eight copies of a
Motion to Intervene in the above-captioned matter on behalf of
the Town of Raymond.

A copy of this letter and enclosed Motion have this day
been forwarded to the City of Nashua, N.H., the Pennichuck
Corporation and the Office of the Consumer Advocate.

Very truly yours,

DONAHUE, TUCKER & CIANDELLA, PLLC

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JJR/nes

Enclosure

Cc: City of Nashua, NH
Pennichuck Corporation
Office of the Consumer Advocate
Richard C. Bates, Town Manager

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PORTSMOUTH OFFICE:

KEARSARGE HOUSE, 104 CONGRESS STREET, SUITE 304, PORTSMOUTH, NEW HAMPSHIRE 03801
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STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

DW 04-048

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, N.H.

MOTION TO INTERVENE

NOW COMES the Town of Raymond, by and through its attorneys, Donahue, Tucker & Ciandella, PLLC and respectfully requests that this Honorable Commission grant it intervenor status in the above-captioned matter pursuant to RSA 541-A:32 Intervention.

1. Pennichuck Water Works, Inc. (or Pennichuck East Utility, Inc. or Pittsfield Aquaduct Company, Inc.) provides water service to Two Hundred Ten (210) households in the Town of Raymond.

2. Thus, the rights, duties, privileges, immunities and substantial interests of its citizenry will be affected by this proceeding.

3. Moreover, water costs in the community directly effect

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 Raymond respectfully requests that this Commission:

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

Respectfully submitted,

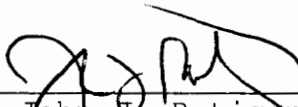
THE TOWN OF RAYMOND
By its attorneys:

DONAHUE, TUCKER & CIANDELLA, PLLC

Date:

7/15/04


By:



John J. Ratigan, Esq.
225 Water Street
Exeter, NH 03833
(603) 778-0686

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Intervene has this day been forwarded via first class mail and electronic mail this date to Commission Staff, the City of Nashua, N.H., the Pennichuck Corporation and the Office of the Consumer Advocate.



John J. Ratigan, Esq.

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