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June 24, 2004

HAND DELIVERED

Deborah A. Howland, Executive Director
New Hampshire Public Utilities Commission
8 Old Suncook Road
Concord, New Hampshire 03301

**RE: City of Nashua v. Pennichuck Water Works, Inc.; Pennichuck East Utilities, Inc.;
and Pittsfield Aqueduct Company, Inc.**

Dear Ms. Howland:

Enclosed please find an original and eight copies of the Town of Bedford's Motion to Intervene in the above captioned matter.

Thank you in advance for your attention to this matter, if you have any questions or concerns please contact me..

Very truly yours,



Eugene F. Sullivan III

EFS/com
Enclosures



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STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

DW 04-056

The City of Nashua

v.

**Pennichuck Water Works, Inc.; Pennichuck East Utilities, Inc. and Pittsfield Aqueduct Company,
Inc.**

Petition for Valuation

Motion to Intervene

NOW COMES the Town of Bedford by and through its attorney, Eugene F. Sullivan III, and respectfully requests that this Honorable Commission grant it intervenor status in the above captioned matter pursuant to RSA 541-A:32 and N.H. Admin. Rules Puc 203.02. In support thereof the Town of Bedford states the following.

1. Through its Petition the City of Nashua seeks to value and acquire the assets of Pennichuck Water Works, Inc. (PWW); Pennichuck East Utilities, Inc. (PEU); and Pittsfield Aqueduct Company, Inc. (PAC) (collectively, the Pennichuck Utilities)
2. The Pennichuck Utilities provide water service to approximately 500 hundred customers in the Town of Bedford.
3. The Pennichuck Utilities, while nominally held under various corporate umbrellas, are operated and managed as an integrated set of assets providing water service in southern and central New Hampshire with the economies of scale and other efficiencies that flow therefrom.

4. The Petition for Valuation seeks to permit the City of Nashua to acquire the assets of the Pennichuck Utilities including those assets outside the Town of Bedford that are part of this integrated system of operation and those located directly in the Town of Bedford.

5. Thus, the rights, duties, privileges, immunities and substantial interests of the citizenry of the Town will be directly affected by this proceeding.

6. Water service and costs in the community are a fundamental aspect of the public health and the cost of those services directly effect land values and economic development within the municipality.

7. Thus, 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 Bedford respectfully requests that this Commission;

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

Respectfully submitted,
Town of Bedford
By and through its attorney:



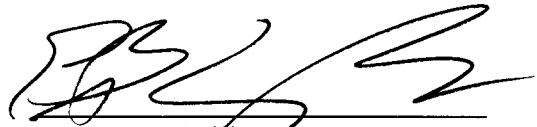
Eugene F. Sullivan III
210 N. State Street
Concord, New Hampshire 03301
603.227.0600

June 24, 2004

CERTIFICATION

I hereby certify that a copy of the forgoing motion has been forwarded via first class mail and electronic mail this date to the Pennichuck Companies, the Office of the Consumer Advocate, the City of Nashua and the Town of Milford .

June 24, 2004



Eugene F. Sullivan III