

CITY OF NASHUA
Petition for Valuation Pursuant to RSA 38:9
DW 04-048

City of Nashua's Responses to Staff's
Data Requests – Set 3 Round 1

Date Request Received: February 7, 2006
 Request No. 3-25

Date of Response: February 16, 2006
 Respondent: George E. Sansoucy, P.E.

Request: Please explain what interest Nashua has in owning and operating the various stand-alone systems of PWW that are both outside the City limits and outside of the core system.

Response: The City of Nashua has proposed to acquire all of PWW, both outside the city limits and outside of the core system. The City of Nashua's interest is twofold: First, the City of Nashua is committed to and believes in the long-term concept of regionalizing the water system in the Merrimack River Valley. Second, PWW has advanced the argument that should the City of Nashua and the core be taken from PWW, that some form of severance cost would be required of Nashua for the balance of the system. Nashua believes that the payment of severance without the acquisition of assets is inappropriate. It believes that in lieu of severance the assets should be sold to Nashua and that it is not in the public interest for the Commission or Pennichuck to require Nashua to pay severance damage without the acquisition of physical property.