

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

RE: PENNICHUCK WATER WORKS, INC.

DOCKET NO. DW 10-091

**SUPPLEMENT TO MOTION FOR PROTECTIVE ORDER
FOR INFORMATION RESPONSIVE TO CERTAIN DATA REQUESTS
AND REQUEST FOR WAIVER OF Puc 203.08(d) & (e)**

Pennichuck Water Works, Inc. (“PWW” or the “Company”) hereby files this supplement (the “Supplement”) to its Motion for Protective Order for Information Responsive to Certain Data Requests of Staff and Anheuser-Busch, Inc. and Request for Waiver of Puc 203.08(d) and (e), which PWW filed with the Commission on August 10, 2011 (the “Motion”). By this Supplement, PWW (i) requests the Commission grant confidential treatment to additional materials not addressed in the Motion and (ii) submits a revised redacted Attachment Staff 2-8, which modifies and replaces the prior redacted Attachment Staff 2-8 submitted with the Motion. In support thereof, PWW states as follows:

1. The Motion requested confidential treatment for information provided by the Company in response to Data Requests Staff 2-8, AB 2-1 and AB 2-2. The Motion also requested that the Commission waive Puc 203.08(d) and (e) to the extent necessary.

2. By this Supplement, PWW requests that the Commission also grant confidential treatment and, if it determines it to be necessary, waive the filing time requirement under Puc 203.08(d) and (e), for the Company’s responses to Data Requests Staff 4-5 and OCA 2-31 for the same reasons stated in the Motion. The information proved by the Company in response to Data Requests Staff 4-5 and OCA 2-31 includes the same information or information of the same nature as that contained in the Company’s responses to Data Requests AB 2-1 and 2-2, both of

which were included in the Motion. Specifically, the instant responses contain confidential water consumption and pricing data of Anheuser-Busch and the proprietary model and formulas employed by PWW's consultant, Mr. John Palko of AUS Consultants.

3. In addition to the foregoing, in response to an inquiry received from the Office of Consumer Advocate after PWW filed the Motion, PWW has determined that a portion of the information contained in the Company's response to data request Staff 2-8 for which PWW sought protective treatment in the Motion should not have been included within that request. Specifically, some of the salary increase information that was included within PWW's request for confidential treatment in the Motion (namely, the 2% salary increase information and the 2009 total annual salary information for certain Company personnel) should have been disclosed because such information was previously disclosed as part of PWW's rate case filing or could otherwise be deduced from other public information. Accordingly, PWW is submitting a revised redacted Attachment Staff 2-8 with this Supplement, which now discloses the 2% salary increase and 2009 total salary information.

4. As previously indicated when PWW filed the Motion, PWW filed with the Motion the redacted versions of the confidential materials in the same form as they were submitted during the discovery phase of this proceeding. Because the documents were produced prior to the effective date of the interim PUC rules concerning confidentiality and redaction of documents, the Company complied with the rules that were then in effect. To the extent the Commission finds that the interim rules are applicable to the materials submitted with the Motion and this Supplement, PWW requests the Commission waive the interim rules because such waiver will not disrupt the orderly, efficient and timely resolution of this matter before the Commission. In addition, the public will not be prejudiced by a waiver of the interim rules

because the descriptions of the confidential materials provided in the Motion and the responses and redacted materials submitted with the Motion and this Supplement, provide the public with sufficient information regarding the nature of the confidential materials, and the prompt resolution of this matter will advance the public's interest.

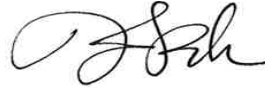
Dated: September 15, 2011

Respectfully submitted,

PENNICHUCK WATER WORKS, INC.

By Its Attorneys

MCLANE, GRAF, RAULERSON &
MIDDLETON, P.A.



By: _____

Steven V. Camerino, Esq.
Jinjue Pak, Esq.
11 So. Main Street, Suite 500
Concord, NH 03301
Telephone: (603) 226-0400
Facsimile: (603) 230-4448
E-mail: steven.camerino@mclane.com
E-mail: jinjue.pak@mclane.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of this Supplement has been forwarded to the parties on the service list this 15th day of September 2011 by electronic mail.



Jinjue Pak