

Original

STATE OF NEW HAMPSHIRE
BEFORE THE
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

**In re: Acquisition of Pennichuck Corporation by the City of Nashua
Docket Nos. DW11-026 and DW04-048**

PETITION TO INTERVENE OF TOWN OF MILFORD

Pursuant to Admin. Rule Puc 203.17 and RSA 541-A:32, I(b), the Town of Milford, a municipal corporation established and existing under the laws of the State of New Hampshire, requests intervention in this proceeding. This petition rests upon the following grounds:

1. The Town of Milford is provided with water supply and service by Pennichuck Water Works, Inc. ("PWW"), a public water system regulated by the Commission and owned by Pennichuck Corporation ("Pennichuck"), pursuant to the terms and conditions of an agreement between PWW and the Town dated as of March 21, 2002.
2. The Town of Milford was granted intervener status and was an active participant in the prior proceedings before the Commission regarding the proposed eminent domain taking of Pennichuck's water system assets by the City of Nashua in DW 04-48.
3. The Town of Milford continues to have vital rights and interests at stake in this proceeding, which involves the proposed change in ownership and management of Pennichuck, and, indirectly, of PWW, as PWW is the contractual provider of water supply service to the Town and its residents.
4. The interests of justice would be served and the prompt and orderly conduct of this proceeding would not be impaired by the participation of the Town of Milford as an intervening party in this proceeding.

WHEREFORE, the Town of Milford respectfully requests that it be permitted to intervene in this proceeding as a full party.

Respectfully submitted,

TOWN OF MILFORD
By its Attorneys,

OLSON & GOULD, P.C.

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CERTIFICATE OF SERVICE

I hereby certify that, on this date, I caused the attached Petition to Intervene to be filed in hand and electronically to the Commission and electronically, or by U.S. Mail, first class to the persons identified on the attached Service List in accordance with NH Puc 203.11(c).

Date: February 22, 2011

David K. Wiesner
David K. Wiesner, Esq.