## THE STATE OF NEW HAMPSHIRE BEFORE THE PUBLIC UTILITIES COMMISSION

Pennichuck Water Works, Inc.

Docket No. DW 19-091

Petition for Declaratory Ruling
Wholesale Water Supply Contract with the Town of Hudson
and
Request for Mediation

## PETITION TO INTERVENE

NOW COMES the Town of Hudson, by and through its attorneys, Tarbell & Brodich, P.A., and respectfully submits the within Petition to Intervene, and in support thereof states as follows:

- 1. The Petitioner, Pennichuck Water Works, Inc. ("PWW"), seeks a declaratory ruling relative to the Wholesale Water Supply Contract dated July 25, 2015 ("Special Contract") between PWW and the Town of Hudson ("Hudson").
- 2. Hudson is a party to the Special Contract.
- 3. The requested declaratory ruling affects Hudson's "rights, duties, privileges, immunities or other substantial interests" under the Special Contract within the meaning of RSA § 541-A:32 and Puc 203.17.
- 4. Under such circumstances, Hudson unconditionally qualifies as an Intervenor.
- 5. Hudson's intervention is in the best interests of justice and will not impair the orderly and prompt conduct of the proceedings.

WHEREFORE, the Town of Hudson, respectfully requests that the Public Utilities Commission:

- A. Grant the within Petition to Intervene;
- B. Grant Hudson unconditional status as an Intervenor; and
- C. Grant such further relief as may be just and appropriate.

Respectfully submitted, Town of Hudson, By and through its attorneys, TARBELL & BRODICH, P.A.

Dated: May 23, 2019

By: David E LeFevre, Esq., BNH #13811

45 Centre Street Concord, NH 03301 (603) 226-3900

## **CERTIFICATION**

I hereby certify that a true and accurate copy of the foregoing has been forwarded by email and First Class United States Mail, postage prepaid, to Marcia A. Brown, Esq., NH Brown Law, P.O. Box 1623, Concord, NH 03302-1623.

Dated: May 23, 2019

David E. LeFevre, Esq.