

**STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

DW 23-101

**PENNICHUCK EAST UTILITY, INC., PITTSFIELD AQUEDUCT COMPANY, AND
PENNICHUCK WATER WORKS, INC.**

**Joint Petition for Approval of Consolidation of Pennichuck East Utility, Inc. and Pittsfield
Aqueduct Company with Pennichuck Water Works**

Petition of the City of Nashua for Intervention

Pursuant to the Order of Notice issued by the New Hampshire Public Utilities Commission in the above-captioned proceedings, N.H. Code Administrative Rules, PUC 203.17 and in accordance with the standards of RSA 541-A:32, the Mayor James Donchess, on behalf of the City of Nashua ("City of Nashua") hereby petitions to intervene in the above-captioned docket. In support of its petition, the City of Nashua states as follows:

1. Rule PUC 203.17 provides that the Commission shall grant petitions to intervene in accordance with the standards of RSA 541-A:32.
2. RSA 541-A:32 provides that a petition to intervene shall be granted upon showing that the petitioner has "rights, duties, privileges, immunities or other substantial interests" that may be affected by the proceeding, and "the interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention."
3. The City of Nashua is a municipal corporation duly organized pursuant to New Hampshire state law and the sole shareholder of Pennichuck Corporation, which in turn owns the three regulated utility subsidiaries Pennichuck Water Works, Inc., Pennichuck East Utility, Inc., and Pittsfield Aqueduct Company.

4. Pennichuck Water Works, Inc., provides water services to the City of Nashua, including for domestic, commercial and fire flow uses by the residents, businesses and visitors to the City of Nashua.
5. The rights, duties, privileges, immunities and substantial interest of the City of Nashua are at stake in this proceeding, both in its capacity as the local government authority on behalf of the interests of its citizens, and in its unique capacity as the sole shareholder of the Pennichuck Corporation.
6. The interest of justice would be served, and the orderly and prompt conduct of the proceedings would not be impaired, by allowing intervention by the City of Nashua in the instant petition.
7. With a finding that the interest of justice would be served by allowing the City of Nashua to intervene, the Commission may grant this petition at any time pursuant to RSA 541-A:32, II.

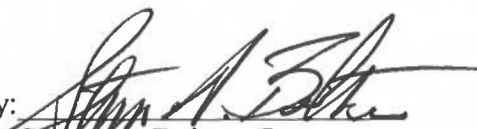
WHEREFORE, the City of Nashua respectfully request that New Hampshire Public

Utility Commission:

- A. Grant this Petition for Intervention, and
- B. Provide any other such relief as it deems appropriate.

Respectfully submitted,
MAYOR JAMES DONCHESS, for the
CITY OF NASHUA
By its Attorneys

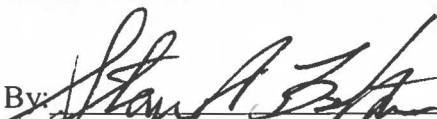
Dated: February 15, 2024

By: 
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been submitted by electronic mail this day to all parties identified on the service list in Docket No. DW 23-101.

Dated: FEBRUARY 15, 2024

By: 
Steven A. Bolton, Esq.