

**STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

DW 23-101

**Pennichuck Water Works, Inc., Pennichuck East Utility, Inc.,
and Pittsfield Aqueduct Company**

Petition of the Town of Bedford for Intervention

Pursuant to N.H. Code Admin. Rules Puc 203.17, and in accordance with the standards of RSA 541-A:32, the Town Council, on behalf of the Town of Bedford (“Town of Bedford”) hereby petitions to intervene in the above-captioned docket. In support of its petition, the Town of Bedford 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, part of the Administrative Procedure Act, provides that a petition to intervene shall be granted upon a 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 Town of Bedford is a municipal corporation duly organized pursuant to New Hampshire law.
4. Pennichuck Water Works, Inc. provides water services to 1,101 customers in Bedford, including the Town at its Library, Town Hall, and Bedford Community Television complex.
5. The subject Petition seeks the following:

- 1) consolidation of all of PEU and PACs assets used to service the customers in the respective PEU and PAC service systems;
 - 2) approve the transfer of all short-term and long-term debt associated with the respective assets of PEU and PAC to PWW;
 - 3) approve the direct acquisition of PEU and PAC by PWW pursuant to the terms of an Agreement and Plan of Merger (“Merger Agreement”) in substantially the form attached as Exhibit A; and
 - 4) approve a consolidated ratemaking structure as set forth in Docket No. DW 23-088 designed to establish rates that balance customer interests with the need of PWW to obtain sufficient cash flow to meet its debt service obligations to Pennichuck Corp. and the City of Nashua.
- 5) Because of the expansive scope of the relief requested, the rights, duties, privileges, immunities and substantial interest of Bedford’s citizenry will be impacted by this proceeding.
- 6) Moreover, water costs in the community directly impact land values and economic development within the municipality.
- 7) The interests of justice would be served, and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention.

WHEREFORE, the Town of Bedford respectfully request that this Honorable Commission:

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

Respectfully submitted,
TOWN OF BEDFORD
By its Attorneys
UPTON & HATFIELD, LLP



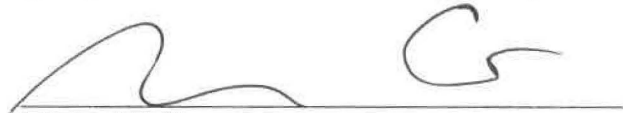
Date: December 29, 2023

By:

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CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that a copy of the foregoing has been e-mailed this day to all parties of record.



Michael P. Courtney

SERVICE LIST – DOCKET RELATED

Docket #: 23-088

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