

STATE OF NEW HAMPSHIRE

**BEFORE THE
PUBLIC UTILITIES COMMISSION**

**AQUARION WATER COMPANY OF NEW HAMPSHIRE
DOCKET NO. DW 10-293**

TOWN OF NORTH HAMPTON'S DATA REQUESTS TO AQUARION – SET 1

The Town of North Hampton hereby propounds its first set of data requests upon Aquarion Water Company of New Hampshire (Aquarion-NH), to be answered in writing, within the time prescribed by the procedural schedule. Unless otherwise specified, the following definitions and instructions shall apply to the data requests.

1. For the purposes of these requests, “document” as used herein, is defined as any writing of every kind in the possession, custody or control of the Company, including but not limited to letter, facsimiles, minutes and records of meetings, memoranda, reports, notes, maps, recordings, transcripts, records of telephone or other communications, vouchers, and other accounting records, lists, engineering studies, rate studies, and economic studies, computer files.
2. For each response, please identify the individual who will be available for cross examination concerning each response.
3. For each response, please identify the individual who is responsible for providing the response and the date of the response.
4. If you cannot answer a data request in full, after exercising due diligence to secure the information necessary to do so, answer the request to the extent possible and state why you cannot answer the data request in full.
5. If the Company has no document which is responsive in any way to any portion of a data request, please so indicate. In addition, please identify the person who determined that no such document exists.
6. With respect to any document or information requested by these data requests that is withheld upon a claim of privilege or immunity, state:
 - i. The data request to which the document or information is otherwise responsive;
 - ii. Its title or description and general subject matter;
 - iii. Its date;
 - iv. Its author(s);
 - v. The person(s) for whom it was prepared or to whom it was sent; and
 - vi. The nature of the privilege or immunity claim.

Documents with respect to which privilege is claimed (including work product) shall be sufficiently described so that North Hampton can bring the question of privilege before the Commission. If any of the foregoing information is itself privileged, you may so state.

7. If third-party information in the possession or control of the responder or the Company is necessary to provide a complete and accurate response to a request, but the consent of such third party is required in order to provide the information to North Hampton, you shall use reasonable efforts to obtain the permission of the third party in a timely manner in order to be able to provide the information in response to the request.
8. If requested data is duplicative of that furnished in response to another data request, please identify the response wherein the information is contained.
9. If you require clarification of a request, please contact John J. Ratigan, Esq. at 603.778.0686 or jratigan@dtclawyers.com.
10. If you produce a hard copy of any responses, please send them to:

John J. Ratigan, Esq.
Donahue, Tucker & Ciandella, PLLC
225 Water St.
Exeter, NH 03833

11. Please provide electronic copies of responses via email to the following individuals:

jratigan@dtclawyers.com

Town of North Hampton's Data Requests to Aquarion

RE: PROPOSED PROJECTS

North Hampton 1-1

With respect to Carl McMorran's 11/1/10 direct testimony, Attachment CM-1, page 5, does the company charge any monies to the individual customer for the scheduled or emergency replacements set forth in account 333 such as the Hobbs Road, Mill Road, Morningside Drive and Huckleberry replacement work?

If so, please state what monies were received? For any monies received, how are they treated under regulatory accounting?

North Hampton 1-2

Please state, in the instance of a power outage, how the company ensures that there is adequate water pressure and water flows to provide continuing fire fighting capacity throughout the service territory? What levels of water pressure and water flows does the company aim to supply during a power outage?

North Hampton 1-3

In the instance of a prolonged power outage (in excess of 2 days), how does the company ensure there is adequate water pressure and water flows for fire fighting?

North Hampton 1-4

If water flows or water pressure is maintained by backup generators, please identify the number of pumps or other mechanisms that are supported by generators, please state whether the generators are on site. If portable generators are used, please state the number of generators that Aquarion has on hand to deploy to these sites in the event of a power outage.

North Hampton 1-5

Please state whether hydrants in North Hampton specifically, and in Aquarion's service territory generally, have been painted to color code to indicate the flows that can be expected at each hydrant? If all hydrants have not been color coded, please state when such color coding can be expected to be completed.

Respectfully submitted,
Town of North Hampton
By its attorneys,

Date: November 19, 2010

By: /s/ John J. Ratigan
John J. Ratigan, Esq.
NH Bar ID 4849
Donahue, Tucker & Ciandella, PLLC
225 Water St.
Exeter, NH 03833
(603) 778.0686
jratigan@dtclawyers.com