

SURREBUTTAL TESTIMONY

of

CHRISTOPHER COLLINS

before the

PUBLIC UTILITIES COMMISSION

DOCKET No. 3674

for

THE TOWN OF CUMBERLAND

September 2005

1 **Q. Please state your name, position, and business address for the record.**

2 A. My name is Christopher P. Collins, Superintendent for the Cumberland Water Department
3 located at 98 Nate Whipple Highway, Cumberland, RI 02864.

4

5 **Q. Does the Cumberland Water Department purchase wholesale water from Pawtucket**
6 **Water Supply Board?**

7 A. Yes.

8

9 **Q. What is the purpose of your surrebuttal testimony?**

10 A. I have read Mr. David Bebyn's rebuttal testimony for Pawtucket Water concerning
11 Cumberland's wholesale water purchases and I disagree with some of his figures on Schedules
12 DGB-R-1 and DGB-R-2. I also disagree with Pawtucket Water's projected 2006 wholesale sales
13 to Cumberland. In addition, I would like to provide some information about the distribution of
14 water between the Cumberland Water and Pawtucket Water systems.

15

16 **Q. Did you provide the wholesale purchase numbers that Mr. Bruce presented on page 15**
17 **of his prefiled testimony?**

18 A. Yes, I did.

19

20 **Q. What were those wholesale purchase numbers?**

21 A. For fiscal year 2003, 572,942 hcf; for fiscal year 2004, 607,116 hcf; and for fiscal year 2005,
22 694,417 hcf.

23

1 **Q. Are those wholesale purchase amounts correct?**

2 A. Not entirely, and I would like to correct them.

3

4 For fiscal year 2005, the wholesale purchase amount that I provided to Mr. Bruce was computed
5 before I received the bill for June 2005 from Pawtucket Water, so I had to make an estimate.

6 Now that I have received the actual June bill, I agree with Mr. Bebyn's figure of 682,462 hcf
7 purchased by Cumberland Water during the 2005 fiscal year, not the original figure of 694,417
8 hcf that I provided to Mr. Bruce.

9

10 For fiscal year 2004, I have reviewed in detail each of the wholesale bills Cumberland Water
11 received from Pawtucket Water, and those bills total 607,116 hcf of purchased water. This is the
12 number that I provided to Mr. Bruce and that he furnished on page 15 of his testimony. Based
13 on the information I have, I believe this number to be correct. On sheet DGB-R-1, Mr. Bebyn
14 uses 548,162 hcf for fiscal year 2004, which I do not believe is correct. Also, on sheet DGB-R-
15 2, Mr. Bebyn lists a credit of 43,490 hcf, of which I have no record.

16

17 For fiscal year 2003, based upon further review of the billings from Pawtucket Water, the figure
18 of 572,942 hcf that I provided to Mr. Bruce was not correct. My wholesale billing records from
19 Pawtucket Water show wholesale purchases of 551,169 hcf as compared to Mr. Bebyn's figure
20 of 545,224 hcf.

21

22 **Q. What do you project will be Cumberland Water's wholesale purchase amount from**
23 **Pawtucket Water for the 2006 fiscal year?**

1 A. Cumberland Water has recently received federal grant money which will be used for a filter
2 rehabilitation project beginning early in calendar year 2006. Therefore, the filter plant will be
3 off line for 90-120 days in early 2006, while this work is being done. This will result in the need
4 for more wholesale purchased water from Pawtucket Water. Accordingly, I am projecting 2006
5 wholesale purchases from Pawtucket Water of approximately 612,000 hcf. This is greater than
6 the 548,162 hcf used by Pawtucket Water in its projection.

7

8 **Q. You mentioned earlier a credit as shown on the testimony of Mr. Bebyn. Could you**
9 **explain your understanding of why there is a credit to the Cumberland Water Department**
10 **from Pawtucket Water?**

11 A. Water from the Pawtucket Water system flows into the Cumberland Water Department
12 wholesale meter for use by the Cumberland Water Department. However, Pawtucket Water is
13 unable to hydraulically service about 350 retail customers of Pawtucket Water located in the
14 Terrace Heights section of Cumberland. Therefore, the water for these 350 retail customers of
15 Pawtucket Water travels through the Cumberland Water distribution system and then goes
16 through a master meter back into the Pawtucket Water distribution system to service the Terrace
17 Heights customers. This also includes pressure for the Pawtucket Water fire hydrants located in
18 the Terrace Heights area so that if there is a fire in that area, the water used to fight the fire will
19 come from the reserve water in Cumberland Water's storage tanks. In other words, some of this
20 wholesale water, rather than going into the Cumberland Water Department system, goes through
21 pipes back into the Pawtucket Water system. Accordingly, the Cumberland Water Department is
22 not using all of the water that flows through its wholesale meter, because some of the water is
23 flowing back through the pipes into the Pawtucket Water system. A credit meter (i.e. master

1 meter) has been set up in order to measure this flow so that Cumberland now receives a net bill
2 and is not billed for the water that is flowing into Cumberland and then back into the Pawtucket
3 Water system.

4
5 **Q. Could you explain the route the Terrace Heights water travels when it is in the**
6 **Cumberland Water distribution system?**

7 A. Certainly. All the water that comes into the Cumberland wholesale connection at Marshall
8 Avenue travels down Marshall Avenue through distribution pipes to the Mendon Road
9 distribution pipes and then to the Angell Road pumping station. It then is pumped up the Angell
10 Road distribution pipes to the Monastery Water storage tank. From there, the water travels
11 through the Diamond Hill/High Street distribution pipes, then through the water meter at the top
12 of Alan Avenue and to the 350 retail customers of Pawtucket Water in Terrace Heights.

13
14 **Q. What does Cumberland Water charge Pawtucket Water for transmitting and pumping**
15 **the water and providing fire protection to these 350 customers of Pawtucket Water**
16 **through Cumberland Water's distribution, pumping, and storage system?**

17 A. We charge nothing. We do this as a public service for Pawtucket Water.

18
19 **Q. Are Pawtucket Water's Diamond Hill Reservoir, Arnold's Mills Reservoir, Robin**
20 **Hollow Pond, Happy Hollow Pond, and Abbott Run wells all located in the Town of**
21 **Cumberland?**

22 A. Yes.

23

1 **Q. Does that conclude your testimony?**

2 A. Yes.

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