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November 29, 2006

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PUBLIC UTILITIES COMMISSION

Luly Massaro, Commission Clerk
Public Utilities Commission
89 Jefferson Blvd.
Warwick, RI 02888

Re: Docket No.: 3761

Petition to Implement Summer Shut off Moratorium

Dear Ms. Massaro:

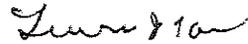
In response to your Notice of Rule Making and Public Hearing provided on October 30, 2006, Kent County Water Authority would like to offer further comments in this Docket relating to Implementation of Summer Moratorium for Summer Shut Offs. The subject matter of this comment is proposed Section X, entitled: Repeal of Prior Regulations, which provides that "All rules and regulations governing the termination of residential electric, gas and water utility services adopted on prior dates are hereby repealed and superseded by these rules and regulations in their entirety." As you recall, the 2002 amendment to the rules and regulations governing termination of residential electric, gas and water utility services included a general exemption to water utilities from compliance with the payment plans described by the commission's new termination rules. Further, and more specifically, the 2002 rules and regulations included a granting by the Commission of Kent County Water Authority's Request For Waiver From Compliance With the Payment Plans Prescribed by the Commission's Termination Rules. The Commission's ruling regarding the general exemption and waiver for Kent County Water Authority noted above, can be found in Docket Number 3423, Order Number 16966, issued on April 16, 2002.

Kent County Water Authority, as part of the Rules and Regulations Governing the Termination of Residential Electric, Gas and Water Utility Service now under consideration by the Commission, hereby requests that the same exemption and waiver noted above from compliance with the payment plans prescribed by the commission's termination rules that was given to water utilities in general and more specifically, to Kent County Water Authority, be included in the order approving the rules and

regulations now under consideration by the Commission and not be superseded or repealed by the issuance of the rules and regulations now under consideration by the Commission.

Kent County Water Authority will be able to provide additional comments regarding this matter upon request by the Commission.

Yours truly,



Lewis J. Paras, Esq.
General Counsel
Kent County Water Authority

LJP:cmb