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PUBLIC UTILITIES COMMISSION

August 17, 2006

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

Re: Docket # 3761 – Petition to Implement Summer Shut Off Moratorium

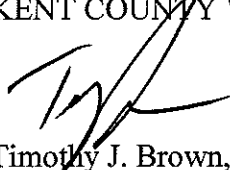
Dear Ms. Massaro:

In response to your memo as Commission Clerk provided on August 4, 2006, Kent County Water Authority would like to offer comments in this Docket relating to implementation of summer moratorium for utility shut offs. Being a water supplier, there are two types of summer terminations that are implemented by Kent County Water Authority during this period. The first is for non-payment of outstanding bills past due by seventy days, and the second being violation of the Odd/Even Watering Moratorium implemented "Mandatory Outside Water Use Bans". The second are used to control demand within our system during emergencies, and may be elevated to full moratorium requiring us to police our system on a 24 hour basis. These are primarily done to eliminate exterior water usage because of public health and fire safety concerns. This cannot be interpreted as a shut off because of non-payment. It is a shut off that is implemented for failure to comply with our regulations. Water is always restored upon the payment of the \$50.00 turn on fee and an understanding by the customer that they will abide by the moratorium and/or the Odd/Even Watering Policy. Without this vehicle, we would certainly not be able to supply our customers and provide sufficient fire supply during high demand periods. If a shut off moratorium is implemented and did not provide for bans such as this, it will be devastating to our ability to supply our customers and would affect the public safety of those customers.

In the case of non-payment shut offs, Kent County Water Authority already ceases these during hot weather where customers could be compromised due to the inability to be served because of failure to pay. We also have a variety of payment plans that are available to the customers under our rules and regulations for termination of service and are readily available at all times for use by our customers. To our recollection, we have not had a problem with termination of service on excessively hot days because of the procedures that we have in place.

We certainly will be able to provide additional comments if the Commission wishes during the presentation of this Docket, and we hope this information is sufficient for your needs. We must emphasize again, the differences between the shut offs under a moratorium of violation of rules and regulations versus payment of customer's bills. We believe the methods we have in place are more than sufficient to protect the customers during the hot weather period and additional regulations are unnecessary.

Very truly yours,
KENT COUNTY WATER AUTHORITY

A handwritten signature in black ink, appearing to read 'TJB', is written over the printed name of Timothy J. Brown.

Timothy J. Brown, P.E.
General Manager/Chief Engineer

TJB/cah